SUPREME COURT OF THE STATE OF NEW YORK

COUNTY OF WESTCHESTER

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FOX VARIAN,

Plaintiffs,

-against

KENNETH EINHORN, PhD, CARMEL PSYCHOLOGICAL ASSOCIATES, P.C., SIMON H. CHIN, M.D., and CAREMOUNT MEDICAL, P.C.,

Defendants.

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Remote Medical Deposition

June 19, 2024
10:00 A.M.

Deposition of CLAIRE DEACON, held remotely, pursuant to Order, taken before a Court Reporter of the State of New York.

COPY

APPEARANCES:

FIEDLER DEUTSCH.
Attorneys for Plaintiff.
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White Plains, New York 10601

BY: JULIA LONDON, ESQ.

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BY: TRACY KATZ, ESQ.

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Attorneys for Defendants, SIMON H. CHIN, M.D., and CAREMOUNT MEDICAL, P.C.
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BY: JOHN BUGLIOSI, ESQ.

ALSO PRESENT:

COPY

STIPULATIONS

IT IS HEREBY STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that all rights provided by the C.P.L.R., including the right to object to any question, except as to form, or to move to strike any testimony at this(these) examination(s), are reserved, and, in addition, the failure to object to any question or to move to strike any testimony at this(these) examination(s) shall not be a bar or waiver to make such motion at, and is reserved for the trial of this action;

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parties hereto, that this(these) examination(s) may be utilized for all purposes as provided by the C.P.L.R.;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that the filing and certification of the original of this(these) examination(s) shall be and the same hereby are waived;

IT IS FURTHER STIPULATED AND AGREED by and between(among) counsel for the respective parties hereto, that a copy of the within examination(s) shall be furnished to counsel representing the witness(es) testifying, without charge.

* * *

CLAIRE DEACON, the witness has been duly sworn in and testified as follows:

EXAMINATION BY

MS. KATZ:

Q Please state your name and address for the record.

A Claire Deacon. 42 Jordan Drive, Patterson, New York 12563.

Q Hi, Mrs. Deacon, I'm Ms. Tracy Katz. I'm from the law firm of Furman, Kornfeld & Brennan. We met briefly back in January when I started asking you some questions. I am going to continue the process today.

If at any point you do not understand my question, please let me know. I'd happy to rephrase it. If at any time you need to a break, please let me know we can take a break. I just ask that you wait until -- withdrawn. I just ask if there is a pending question, you answer the question before we take the break, okay?

A Yes.

Q There may be times during today's deposition where you can anticipate where my question is going. I just ask that you wait until I completely finish my question, before you answer.

That way we try to avoid speaking over each other. It will make the court reporter's job a lot easier, okay?

A Clear.

Q Your current address at 42 Jordan Drive; do you still live there with your husband Thomas Deacon and your daughter is it?

A Yes.

Q Is your daughter's current name Fox Varian?

A Yes.

Q Is that her full legal name, currently?

A It is her legal name, yes.

Q What is her full name?

A Fox Grayson Varian.

Q That is her full legal name?

A Yes.

Q Okay. Prior to coming here today for your deposition, between the last time we are here and today, have you reviewed anything; any documents, any photographs, any testimony?

A No.

Q Have you ever reviewed a copy of your daughter's testimony in this case?

A No.

Q Did you review any of Dr. Einhorn or Dr. Chin's testimony in this case?

A No. I don't even have that available to me, to my knowledge.

Q Did you review any notes of your own, regarding any of the care and treatment your daughter received from either Dr. Einhorn or any of her other medical providers?

A No.

Q Now, you mentioned last time you were here, that in 2019 you filed for bankruptcy. Was that bankruptcy petition has it been dismissed or otherwise resolved?

MS. LONDON: Objection.

Objection. What does the bankruptcy petition have to do with her daughter's treatment in this case.

MS. KATZ: Mark it for a ruling.

(Ruling.)

BY MS. KATZ:

Q Are you currently employed?

A Yes.

Q You're still employed as an LPN?

A Yes.

Q That is through CE Home Care?

A Yes.

Q You attended school at BOCES to become an LPN, is that correct?

A Correct.

Q During your school training to become an LPN, were you taught anything about obtaining informed consents for surgery?

A That was in like 1995. I don't believe that was in our coursework, but I certainly, that many years ago, you know, couldn't be sure but I highly doubt it as a licensed practical nurse, that we had anything related to that in our studies.

Q In the course of your employment as an LPN, have you ever been involved in obtaining informed consent for any procedures?

A I have never worked in a facility. I have always done private care. I don't recollect, but I would lean towards saying no, that is not anything that I had anything to do with.

Q So, what are your current job responsibilities, as an LPN?

A I work in private duty. I have a young man with Duchenne's muscular dystrophy. Another child with something called Rett syndrome, a neuro disorder. Just, you know, giving daily care, trade

care, bathing, feeding, medication. I did have other types of cases; spinal cord injuries, you know, they are at home in need of nursing skills to, you know, help the family be able to keep their loved one at home.

Q Are you employed full-time?

A Yes.

Q Your Fox's father, biological father, is John Basile, is that correct?

A Correct.

Q Do you have any contact with him currently?

A Not really. I mean, I texted him recently, but he rarely answers. I have had no communication with him for years basically.

Q At some point, there was a custody hearing or custody case, between you and John about Fox's custody arrangement, is that correct?

A Correct.

Q And what was the outcome of that custody battle?

A I believe it ended with joint custody, but me being the custodial patient. He had visitation.

Q Did he have any involvement in speaking

to Dr. Einhorn, as far as you know?

A I don't recollect that. I texted him at that time. This was years ago, that, you know, this is what Dr. Einhorn was recommending. And that was about it.

Q Was it one text or more than one text?

A I don't recollect. I don't believe it was there was nothing at length. He was against it. And I was going with what Dr. Einhorn was repeatedly recommending, so I informed him of that. But at that time, Fox hadn't seen her father in years and had had no contact with him.

Q When you say that John Basile was objecting, are you talking about objecting to her undergoing top surgery?

A Correct.

Q Did you talk to John about the decision to have top surgery over the phone at any point or in person?

A No.

Q So, it want was only via text?

A Yes.

Q Do you have those text messages?

A No. This was years ago. It was probably at least two phones ago, at least.

Q Do you have the same phone number?
A I have the same phone number.
Q What is your phone number?
A (Omitted.)
Q Can I just heard that back?
A (Omitted.)
Q Who is your cell carrier?
MS. LONDON: You have the number, but can we have that redacted in the record, please.
MS. KATZ: Sure.
MR. BUGLIOSI: Consent.
BY MS. KATZ:
Q What is your cell phone carrier?
A Presently T-Mobile.
Q Do you know if it was T-Mobile back in 2019?
A It was probably was not.
Q Why do you say that?
A I believe I have been with T-Mobile for like three years I think. I really don't know for sure.
Q What was your prior carrier?
A CREDO, I think.
Q When you say you have had a number of

different phones over the years, what kind of phone do you currently have now? Is it an iPhone? Is it something else?

A It is a Samsung Galaxy.

Q Did you have a Samsung Galaxy, back in 2019?

A Yes.

Q If you go to your text messages with John Basile, scroll back, is there anything from 2019 there?

A No.

MS. LONDON: Objection.

BY MS. KATZ:

Q Have you looked?

A There has been virtually no contact and when you get a new phone, at least with the Samsung Galaxy your messages from prior to that, like your contacts may be there in, but previous texts aren't there.

Q Okay. I will make a request that you just double check your phone to see if you have you any prior texts with Mr. Basile, about your daughter's transition, and if so, you preserve those, okay?

A Okay.

MS. LONDON: Fine. Can you put it in writing?

MS. KATZ: Sure.

(Request.)

BY MS. KATZ:

Q Prior to -- prior to texting John about your daughter's surgery, had you texted him about her name change?

A I don't recollect. I don't believe so but I'm not positive.

Q Back in 2018 or 2019, did John have any contact with your daughter?

A No.

Q Did they communicate via text if you know?

A No.

Q When your daughter was born, what was her birth name?

A Isabella Basile.

Q Does she have a middle name?

A Grace.

Q Grace or Grayson?

A Grace.

Q Did Isabella attend preschool?

A She attended preschool.

Q Then did have any problems studying preschool, socially or educationally?

A No. It wasn't full-time. It was part-time. Maybe two days a week.

Q Then at some point, she started attending JFK Elementary School, is that correct?

A Well, she went to a small private school, prior to that. That was ordered in the custody case, to be in the public school.

Q What school was that?

A It was called Crossroads School. It was in Brewster, New York.

Q What years did she attend Crossroads?

A I believe that was like she was four years old, and five years old.

Q Then in the custody battle, it was ordered that she go to public school?

A Crossroads closed. And another school, similar, opened. And we transitioned her into that school with a lot of the students that had been at Crossroads.

Q What was the name of that school?

A The Longview School.

Q Longview?

A Yes.

Q She attended Longview School until about age, actually, what age did she attend Longview School to?

A I don't recollect. Her father didn't want her there. Then she was having difficulties at Longview, so the judge ordered that she go to the public school. And that was second grade. So I believe that might be seven years old, seven-ish, when that was short-lived.

Q JFK was short-lived, is that what you mean?

A Correct.

Q When you said that John did not want her at Longview, did he tell you why he did not want her there?

A No.

Q Was the reason that you wanted her there as opposed to a public school at that time?

A I feel that she would benefit from a small school where she, you know, was not overwhelmed, you know, in big classrooms. And I believe that for all kids. Shouldn't be in classrooms with 25 to 30 kids when the small private school there was a lot more attention for each student.

Q Was there anything specific to Isabella at that time, that made you feel she was a better fit for Longview, as opposed to what you just told me in general?

A I am sorry. Can you I feel like I understand what you are trying to say. I just believe that for myself. So prior to having a child that that I mean I didn't overly think about it but when it came time for my child to be in a school that is what I wanted for her like a Montessori type school.

Q Aside from just generally in your general belief as to that being a better education, was there anything specific about Isabella, that you made you think that she specifically would be a better fit for that type of school?

A No.

Q Prior to her being admitted by the judge to go a public school, you had made the decision for her to go to Longview School because you thought that was best for her, correct?

A Correct.

Q So, she attended -- withdrawn. How long did attend JFK Elementary School?

A I don't recollect, but I was going to

remove her, and when I called to speak with someone in administration, they said don't bring her. That she had, you know, severe emotional issues, that they were not equipped to deal with.

Q Why were you going to remove her?

A The therapist Kate Roell at the time, there was an accident that she said that they could have taken her, via police or an ambulance, to a place like Four Winds, which is a psych hospital. She pushed a table when in a conference room because she didn't want to go into the classroom. And there was a staff member that said she was injured from a seven-year-old, pushing a table. So I was afraid that if an incident like that, were to occur, that she could be taken remanded into a hospital, a psych hospital, at seven years old.

Q Did -- when did your daughter start -- withdrawn. When did your daughter --

MS. LONDON: Claire, just a reminder, you can take a break if you need it, any time, okay?

A Thank you.

BY MS. KATZ:

Q When did your daughter start seeing Kate Roell?

A I believe she was 7. And it was ordered by the court.

Q Were you present during the session with Kate Roell?

A Definitely at times and certainly until she became comfortable. Fox became comfortable with her.

THE REPORTER: Can you spell the last name.

THE WITNESS: R-O-E-L-L. If I remember correctly.

BY MS. KATZ:

Q Do you remember any diagnoses that Kate Roell gave to your daughter?

A I don't believe that she diagnosed her, formally, with anything. She was like a licensed mental health therapist. Not to say that she couldn't. But I believe that is reserved more for psychologists or psychiatrist, via testing, certain testing, which did come later.

Q Did Kate Roell ever recommend medication for your daughter?

A I don't recollect, but I don't think at seven and eight years old that that was happening, you know, medication. I could be wrong. It is

quite a long time ago.

Q Anything you don't remember, you could just tell me you don't remember, that is fair enough. I understand some things are a long time ago, so anything you don't remember, just tell me. And that is fine, if you do remember, great. Then let me know.

Was John ever present with any visits with Kate Roell, as far as you know?

A The custody case was in full swing at that point. And I don't believe I, personally, ever sat in the same session with him.

Q Do you know if he ever went with her, separate from you, if you know?

A I believe he did. Certainly, phone conversations and, you know, e-mails.

Q Around 7, when she had this incident, at Longview where she pushed a I think you said a table, yes, pushed a table, prior to that, were you aware of any social or emotional issues, that your daughter had?

A It wasn't at Longview. It was at the public school, JFK.

Q Sorry. My apologies. Okay, so prior to that incident at JFK, were there any signs or

were you aware of anything?

A Yes.

Q Can you tell me what those were?

A The reason she was in a conference room is because she was refusing to go to the classroom. She would be dropped off brought into the school very reluctantly, you know, she was used to a small setting, you know, with teachers, that, you know, were familiar to her. And, you know, you know, eight kids in a classroom, with a teacher to this kind of I think what was for her at the time, overwhelming and all these visitation issues. And psychologist, and interviewing with the school psychologist. This was all very traumatic for her so I had already been told by the judge to make not make any unilateral decisions or he would take her away from me.

Despite that, after Kate Roell explained to me they could make a phone call and she could be taken by a police car or an ambulance, to a hospital, against both her parents' will, I was going to make that decision, that morning. And when I called to speak to someone, the secretary said that the principal wanted to speak to me. So we were well aware that there were issues happening

and it stemmed in my opinion for what it is worth from the contentious custody issues and her visitation, and home environment changing, constantly, which was happening.

Q So, you were going to make the unilateral decision to remove her, because that is what you thought was best for her, is that correct?

A Correct.

Q Now, by the way, up until this time around, who was her pediatrician?

A Riverside Pediatrics, which is I don't even know what it is called now. It's been taken over by a bigger and she is not there anymore but that Riverside Pediatrics was in Croton-on-Hudson.

Q Did she have one specific doctor that she saw there as her pediatrician?

A No. She saw whoever was available.

Q Was your -- did your daughter receive her childhood vaccinations?

A No.

MS. LONDON: Objection.

BY MS. KATZ:

Q Why not?

MS. LONDON: Objection.

BY MS. KATZ:

Q She can answer?

MS. LONDON: How is this relevant.

BY MS. KATZ:

Q It is because she is making medical decisions for her daughter and that is what this is about?

MS. LONDON: You can answer, over objection.

A So, she did not have vaccinations.

BY MS. KATZ:

Q Why is that?

A I have seen and heard from people I knew directly, that their child was vaccine-injured, so I read a lot of information about it, and my daughter is not vaccinated.

Q So, she is not vaccinated for polio?

A She is not vaccinated.

Q She vaccinated for measles?

MS. LONDON: Object to this line of questioning. I still don't understand the relevance. We can mark it for a ruling.

(Ruling.)

BY MS. KATZ:

Q No. She has to answer. We can call the court. She is making medical decisions for her daughter. You know, I will ask it another way. Did any of your daughter's pediatrician, recommend that she get vaccinated?

A No.

Q Did you ever discuss with any of her pediatricians potentially getting vaccinated?

A I am sorry. I left the pediatrician that saw her in the hospital because he was adamantly pushing for vaccines, so I went to Riverside Pediatrics, because I knew other people that went there. And they were very open to you making your own decision with them.

Q So the pediatrician you saw in the hospital you are talking about when Isabella was born?

A Right.

Q And, the pediatrician when she was born, wanted your daughter to get vaccinated?

MS. LONDON: Again, I am objecting. We can call the court if you want. The treatment at issue in this case is the child is 16 years old. You are talking about vaccination when she

was a baby?

MS. KATZ: Yes.

MS. LONDON: Object to this line of questioning.

BY MS. KATZ:

Q Goes to her. Okay. Am I correct, that you don't agree with every doctor's recommendations, true?

A Correct.

Q As much as the pediatrician, that you spoke to, when your daughter was born, was pushing you and adamant that should have vaccination you decided otherwise, correct?

MS. LONDON: Objection, that is not what she testified to.

BY MS. KATZ:

Q She can answer the question.

A Can you say the question again.

(Whereupon the requested portion was read back by the reporter.)

A I decided otherwise.

BY MS. KATZ:

Q Now, at Riverside Pediatrics, did you ever have any discussion with any medical providers about the pros or cons of vaccinations?

A I don't believe so.

MS. LONDON: Again, objection. Don't answer that.

MS. KATZ: Already answered.

BY MS. KATZ:

Q At any point, did anyone from Riverside Pediatrics recommend, at any point, that your daughter go on either anti-anxiety or antidepression medication?

MS. LONDON: This is when?

BY MS. KATZ:

Q At any point? At any point she was treating at Riverside Pediatrics?

A I don't believe so. I don't remember.

Q At any point, did Christy Gotto recommend that your daughter go on any medications?

A I believe so.

Q Did you talk to Christy Gotto about that recommendation?

A Yes. We spoke about it. We saw somebody. We referred to somebody. She is not able to prescribe medication.

Q Who did Christy Gotto refer you to?

A I believe it was someone at Carmel Psychological, I believe so. I believe it was a

nurse practitioner, possibly, that we saw.

Q And, at any point, prior to seeing Dr. Einhorn, did anyone else other than Christy Gotto, recommend your daughter go on either antidepression or anti-anxiety medications?

A I don't recollect.

Q Did you agree with Christy Gotto's, recommendation or did you disagree with it or something else?

A We saw the person that I don't know that she specifically recommended. Just that we get assessed. And I believe it ended up, and I don't -- I think it was just a general assessment. And I believe that practitioner wanted to put Fox on something ADD.

Q Did your daughter go on medication for ADD?

A No.

Q Why not?

A I didn't feel that the ADD was the reason she was experiencing learning issues and, you know, other difficulties in the school setting. And when I spoke to Christy Gotto again, and said we opted not to go on Adderall, she said something to the effect of yes it is basically speed, you

know, for little kids, so in my head I remember thinking well you didn't say that prior, which I guess she wanted us to get assessed. And go from there. But it seemed like she agreed with my decision. I can't be positive. But that is what she said, you know, basically alluded that these are powerful drugs, and, you know, they're being overprescribed.

Q Did Christy Gotto ever recommend that your daughter go on like an antidepression and or anti-anxiety, medication separate from an ADD medication?

A I can't be positive. I know that we went to be assessed and it wasn't just for the ADD. It was for medication in general and I believe that that practitioner felt that in her assessment, that it was the, a lot of the difficulties were from ADD.

Q When was this assessment?

A I don't recollect. She was maybe 11. 10, 11. Somewhere in there. I don't remember exactly.

Q You don't remember where she went for that assessment?

A I believe it was Carmel Psychological.

I believe. I believe it was a nurse practitioner in that practice. It was a one-time visit. I don't recollect her name. It was a woman.

Q Was that immediately prior to your daughter being referred to Einhorn or was this years prior?

A This was prior.

Q Years prior?

A I believe so.

Q If I told you that your daughter testified that Christy Gotto brought up the idea of medications numerous times and that your daughter refused partially based on your religious convictions?

MS. LONDON: Direct us to a page.

BY MS. KATZ:

Q I didn't finish the question. Would you agree with that statement?

A I can't agree or disagree, because I don't recollect.

Q Do you have religious opposition to medication?

A When my daughter was the ages that she was in elementary school and into middle school, when I filled out paperwork for an exemption for

being vaccinated to get into school the only available exemption is a religious exemption, so I feel like that is what my daughter was familiar with. I was filling out forms for a religious exemption.

Q Are you religious?

MS. LONDON: Objection. Don't answer that. Objection.

BY MS. KATZ:

Q I will rephrase it. Does religion at all, play into your anti vaccination stance?

A No.

MS. LONDON: Again I object.

BY MS. KATZ:

Q So aside from your own personal research, and speaking to various friends, did you ever actually speak to any medical doctors, about pros and cons of vaccination?

MS. LONDON: Objection. Don't answer.

MS. KATZ: She has to answer.

MS. LONDON: Why does she have to answer. This is not again it is completely irrelevant to the treatment at issue. We are talking about when Fox

was.

MS. KATZ: Relevancy is not an objection. And it is my position it is relevant.

MS. LONDON: So you're asking about what was your last question? Read back.

(Whereupon the requested portion was read back by the reporter.)

MS. LONDON: How is pros and cons of vaccinations how is this line of questioning in any way whatsoever relevant to the treatment at issue in this case?

MS. KATZ: If you want to have a conversation off the record, we can talk about it off the record. I don't need to explain why I think it is relevant. It is. And that's not a proper objection at a deposition and you know that?

MS. LONDON: You can answer the question.

A While my daughter was a patient at Riverside Pediatrics, for many years, was never an

issue. They are very open to many families choosing to not vaccinate their children. So I didn't to go in there and them keep saying when are you going to vaccinate, when are you going to this, when are you doing this, this needs to be done, they were fully supportive of parents that wanted to vaccinate. They were fully supportive of parents that want to space out vaccines and they were fully supportive of parents that did not want to vaccinate their children.

So I did not repeatedly bring my child to a pediatrician that I was constantly at odds with and arguing my point of view. That is why I was there and other families, were there, because specifically Dr. Cowan. But I mean, even the other doctors, that we occasionally saw, it was not it wasn't it was a nonissue. I went for the issue at hand, whether it was maybe an ear infection or a school physical and nobody was pushing, like, this needs -- this is important. You have to do this, et cetera, et cetera.

Q I understand. I am just asking. Just I am asking at any point, did you ever have any conversations with anyone about I don't want to vaccinate, and this is why and then someone else

and then a doctor did you have ever have any conversations about pros and cons, pluses and negatives, either spacing out vaccinations, not doing vaccinations just asking did you ever have a conversations with any medical doctors about these issues?

A I feel like.

Q Never brought up -- sorry.

MS. LONDON: Objection, asked and answered.

MS. KATZ: It wasn't.

MS. LONDON: It was. She just testified she did not want to discuss vaccinations with the doctor she felt that she was constantly at odds with.

A I am saying it was not an issue. They were fully supportive of parents that didn't vaccinate. So I didn't have to have a conversation. It wasn't like I objected. Like no no no I made my case.

Q I think you misunderstand my question. My question is not whether you were arguing with the doctor. My question is whether you ever inquired saying I want to vaccinate, can you talk to me a little about vaccinations. Maybe a doctor

gave you some information about pros and cons, was there ever actually a conversation, at all?

A I don't believe so.

Q Okay, that is all I want to know. When your daughter was either removed or stopped going to JFK Elementary, what did you do for her at school after that?

A I don't fully recollect. I believe we were waiting for the Brewster school district to find an appropriate placement for her, for a child that had the emotional issues, that she was exhibiting and then I believe it came down to being at Green Chimneys school and it is for kids that have I don't even know I guess, you know, difficulties in a, you know, traditional public school setting.

Q Then at some point, she stopped seeing Kate Roell, and switched to treating with Christy Gotto her therapist?

A I believe Kate Roell closed her business yes, and then I don't know if she recommended Christy or not. I don't recollect.

Q Okay, but did your daughter see any other therapist, between Kate and Christy?

A I don't believe so, other than the

school psychologist, you know, assessing her, the court ordering a psychoeducational battery of tests, like, yes, like an actual weekly therapist, I don't believe so.

Q Were there ever any conversations with Kate about your daughter's gender?

A No.

Q Were there ever any conversations with Christy about your daughter's gender?

A I don't recollect if it was gender or just my daughter because I feel like, maybe she was still with Christy when she said that she felt like she was gay but it is possible. It is possible, that she talked about, you know, gender issues. Definitely not trans.

Q Move to strike the portions that are non-responsive. When is the first time that you became aware of your daughter's dissatisfaction with her gender or her body?

A While when she was seeing Christy, she was experiencing, like, an eating disorder, but I don't recollect it, so that is dissatisfaction with her body, but I don't know that it would be gender-specific.

Q When is the first time you became aware

that she was dissatisfied with her gender or her hey experience as a female?

A I would say, she was probably maybe 15.

Q What happened around when she was 15, that you noticed?

A I was involved with seeing, you know, sitting in on sessions with Dr. Einhorn, and that you know just there came a point where I said I don't feel like I have to sit in all these sessions because my daughter wasn't comfortable. I don't recollect it was a while. At some point, you know, in her sessions with Dr. Einhorn, and I don't believe my daughter was telling me. I believe it was him assisting her in speaking up for herself to tell us that this is how she felt, like, non gender conforming. I don't really fully recollect the, you know, all the details.

Q So, when let's just go back to, you know, a prior to let's talk about prior to the custody battle, so I think you said was around 6 or 7, is that right?

A Yes. 7.

Q So prior to that, when she was, really young, you know, 5, 4 -- did she ever say she felt, like she was a boy?

A No.

Q Did she have any hobbies around those ages?

A I mean she was a young child, like, we went to the beach. We went to the playground. She played with her little friends, predominantly girls because most of my friends had girls around the same age. She had a lot of she had a couple of friends from the schools she was in; Longview, Crossroads and Longview, that she played with. So whatever little girls you know run and play, and.

Q Did she have, like, any specific toys that she liked to play with over others, like, LEGO's or dolls or blocks or anything like that?

A Are we talking, like, age 6 and 7 and 8.

Q Yeah?

A She wasn't like big into like dolls, but, you know, like, more like her stuffed animals, you know, but I was a very outdoorsy person and I guess we ended up gravitating towards having friends that, like, we, you know, we did a lot of swimming. The kids ran around outside, and you know hiking, and.

Q Okay. Up until, you know, 5, 6, did

she ever express her gender preference, by dressing any certain way?

A My daughter never uttered a word about feeling like a boy, wanting to be a boy, exhibiting I mean I was a tom boy. Nobody was try to say that, you know, was I a boy, did I feel like I needed a penis, did I like need to feel like I shouldn't have breasts, like my daughter was the same. There was not one utterance about wanting to be a boy, feeling like she wasn't a girl. Didn't feel like a girl. Normal happy kid.

Q Until she was 15, is that correct?

A I know with Christy, there were definitely things brought up. Like, she sat me down, maybe she was 12 or 13. Said she felt like she was a gay. And it was a big. She sat me down in her room. And you she struggled to find the words. I was, like, okay, all right, I don't, like, this isn't earth shattering. I support you. I love you. That is fine.

Q When you're saying when your daughter was treating with Christy, your daughter confided in you, that she thought she was gay?

A I believe she was still with Christy at that time, yes.

Q Around that time did she say anything about her gender as opposed to her sexual orientation?

A I don't recollect. I don't believe so.

Q Now, when your daughter -- withdrawn. Did your daughter, at some point, go through puberty?

A Yes.

Q Okay. Do you know how old she was?

A Like, 11, 12, when she developed breasts.

Q What school was she in at the time?

A I don't recollect. She was at Longview, I believe three times over the years of trying to, you know, the school district, you know, when she -- when I, you know, felt, like, Green Chimneys wasn't the best placement for her, she was left with no schooling. There were periods where she didn't go to school. We were here waiting for them to find an appropriate placement.

Q When your daughter started developing breasts, did you have any discussions with her, about how she felt about that?

A I don't believe so, but I know that, you know, she had a strong reaction, to going

through puberty, to having her first cycle.

Q Having her first menstrual cycle?

A Correct.

Q When you say she had a strong reaction, tell me what that was?

A She was crying in the bathroom.

Q Did she tell you why she was crying?

A No. I mean, I could -- I could understand I could see, that you know, and what I felt at the time, she had a lot of emotional issues from a three-year custody problem and just contentious, all the way around. Her father kind of in and out at that point. And so, I felt that she just wanted to be a little girl still and didn't want to grow up.

Q Did you talk to her about, like, going through puberty and changes that her body would go through?

A Yes.

Q What did you tell her?

A I don't remember specifically. Just, you know, like, you get your period, and these are the pads that, you know, you use. And you know and when she needed bras it was, like, it is time for a bra, you know, like even if it is a training bra

she had all that stuff. I don't remember the conversations, you know, like, specifically but I definitely we had conversations and we went and, you know, you know, got training bras and then got regular bra and.

Q Did she wear a training bra and regular bra for a period of time?

A She did.

Q Did there come a time where she stopped wearing regular bras and switched to wearing a sports bra?

A She was older. And I -- I know that she was seeing Dr. Einhorn for sure when now we are hearing about being like nonbinary and she wanted to bind and cover up that she had breasts and wanted to dress like a boy.

Q Move to strike the portions that are non-responsive. Did there come a time where she stopped wearing regular bra and started wearing a sports bra?

A I wouldn't, yes.

Q Okay, as far as you recall, when was that, that she switched to sports bras?

A Maybe, maybe, 14, but definitely 15. I believe it was 15, but I can't. I don't know one

hundred percent.

(Whereupon, a recess was taken at 11:05 a.m.; whereupon, the deposition resumed at 11:13 a.m.)

BY MS. KATZ:

Q If I did told you that your daughter testified that at one point she told Christy Gotto that she might be gender fluid, does that refresh your recollection as to her expressing that around that time?

A Yes.

Q Were you there for any of those conversations?

A No.

Q Do you remember talking to your daughter about that, feeling that way, at that time?

A I believe she mentioned it that one time, I think around the time the same thing that she said she felt like she was gay.

Q Was there a discussion about gender as well?

A No, not at that time. I don't believe.

Q So, when your daughter said she felt like she might be gender fluid, was there any more

discussion about that?

A No.

Q Did you ask your daughter what she meant by that?

A I believe we, I believe, you know, when she said she was gay like I remember, you know, just, like, I didn't say it to her, just, like, okay, you know, like, we are starting to watch shows together and she is not, like, several of my friends that have kids around the same age, like, talking about cute boys whether in real life or on a TV show. She wasn't, she wasn't like that at all. She was not talking about thinking a girl was pretty or anything, either.

Q Your daughter went to Green Chimneys from around the age of 8 to 11, is that correct?

A Maybe about two years. So maybe, like, 8 and a half-ish, like, somewhere in there. Sounds I can't say one hundred percent accurate. She wasn't there, like, three years, I know that so, maybe eight and a half to, like, ten and a half.

Q Okay. And did she see a school therapist or psychologist or social worker there?

A I believe it was a social worker.

Q Do you know that person's name?

A I don't. I feel, like, her name. I am not positive but I feel, like, Emma, that just kind of jumped into my head. Someone named Emma was her social worker there.

Q And how did your daughter do at Green Chimneys?

A It was with a disastrous time.

Q Actually, just stepping back for a second. The school she had been in prior to Green Chimneys, was that, that was Longview, if you know?

A I believe.

Q Or JFK?

A I believe, it was JFK.

Q Okay. At JFK, aside from her, like, social issues, was she having, like, educational problems, as well?

A Severe. She wouldn't even enter the classroom. That was the whole pushing the table and Ms. Roell saying this could land her being in a being psych hospital at seven and a half, eight years old, without her parents' consent.

Q Prior to -- did Riverside Pediatrics ever mention to you that she ever had any learning disabilities?

A No.

Q As far as you are aware, are Fox's, you know, I guess, main inhibitors, to her education, more social emotional as opposed to intellectual if you understand my question?

A Yes, that would be accurate.

Q I am correct that she intellectually she is, in fact, very smart?

A Testing indicated that she was not in fact bright at all. That she her IQ was borderline, you know, being handicapped emotionally, I am sorry, intellectually.

Q And, what is your impression of her, intellectually?

A I am going to say that testing indicated that testing while she was, while we were involved in the custody case, you know, initially was ADD further testing indicated that she was in fact, you know, on the autism spectrum. What else do you want me to? What other information do you want?

Q Is she able to read?

A Yes.

Q Does she have how is her reading comprehension, if you know?

A I believe testing indicated that, you

know, reading and, you know, I guess language skills she was stronger in. But she again I don't know how you have an 85 IQ and be considered, you know, I mean I was very upset with that, you know, people, not experts, said, you know, you got to look at the child and, you know, -- she is not not unable to read, not unable to write but she had learning disabilities, she had learning disabilities, in addition to the definitely emotional psychological issues.

Q Green Chimneys; why was it a disastrous time?

A I will never know if she wasn't distraught and traumatized by the custody issues. However I don't believe that she ever belonged in a school, like Green Chimneys, which is predominantly boys that have severe behavioral challenges. My daughter was thrown on her face by three adults, when she wouldn't enter the school, like, that is one example. And my daughter is a sensitive, a very sensitive child. She was a very sensitive child.

She is a sensitive adult. So when your child is thrown down on their face in the grass in the cold dew on a cold March day, because they

won't enter the school, you know, my hands, you know, were tied. I could not, you know, I advocated for her the best I could, in that situation.

Q Okay. Why did she stop attending Green Chimneys?

A I took her out.

Q When did you take her out?

A I don't recollect, but, you know, she was there maybe about two years. I picked her up, and, you know, once she was -- she wouldn't, like, cry, in the school area. And I could tell by her face that something had happened. And, you know, as we got closer to the parking lot away from the school, she burst out sobbing and she was angry, and extremely upset and she had been, like, you know, dragged from the classroom to the emotional support room, because she wouldn't read out loud, which her IEP was, you know, that she had anxiety she should be given extra time for testing, you know, she had an IEP. She had marked learning issues, emotional issues. And they were not being honored there. Because when a kid is experiencing severe anxiety and she didn't want to read out loud, due to that anxiety, she was dragged to the

emotional support room by, like, two men or whatever. Something to that effect, so.

Q So, did you make the decision to pull her from Green Chimneys, before you picked her up that day or was that just like a you picked her up one day and she told you this story and you decided not to bring her back or?

A There were other issues. There were meetings about this, that, and the other. I hired an educational advocate. I paid out-of-pocket someone who certainly made a lot more money than I did to bring her to a meeting, for instance, and, you know, me saying some of the issues that my daughter was explaining to me. My voice wasn't heard.

So when I brought an educational advocate, certain things were rectified immediately or changed, you know. So it was a constant evolving situation there, where there was a time that her social work worker, I believe her name was Emma advocated for my daughter and along with me.

Q But the decision to remove her essentially what you're saying this was like a long drawn-out process and the decision was not just one thing?

A It wasn't just one thing. But that that, situation that I just mentioned was -- was the last straw.

Q Okay. So, in other words, when you went to pick her up that day, the plan was to bring her back to school, but you decided not to, is that correct?

A I believe so.

Q Okay.

A I don't remember, you know.

Q Exactly. That decision to remove her from Green Chimneys, do you know when in the school year that was; in the fall, in the spring?

A I believe it was spring possibly. I believe the weather was warm. Again, I can't be a hundred percent sure. It was a long time ago.

Q When you decide to pull her from Green Chimneys, did you have a discussion with her as to whether or not she wanted to be removed from Green Chimneys?

A My memory is being jogged a little bit as we discuss this things I haven't thought about in a very long time. It was absolutely discussed with Christy Gotto. That it was not an appropriate setting and Christy Gotto trying to get her father

onboard. So, again, it wasn't a decision that was being unilaterally made by me. And the judge would then feel quite confident that he could take my daughter from me, in its entirety and either put her in a foster care system, which he threatened or one hundred percent with her father. She did not want to be with her father one hundred percent or even 50 percent of the time. And she was very vocal in telling me that.

And not understanding why she could tell the law guardian that she didn't want to be with her dad, 30 percent, 40, 50. It changed a lot over three years. And her telling him that, the reasons why she hated Green Chimneys and didn't want to go there. And her therapist was onboard with that, trying to convince John to remove her from that school. He and I, making that joint decision.

Q And you and John did eventually make that joint decision?

A No. He was never onboard. Again, when my kid is being physically restrained and dragged, out of the classroom because she wouldn't read out loud, I had to make decisions at times that I didn't feel that I should be making alone but I was

left with no choice at times.

Q Were making the decision that you felt was best for your daughter?

A Yes.

Q After Green Chimneys, she went back to Longview for a period of time, is that correct?

A Again, I don't remember, if it was immediately I don't believe it was. I believe again I could not make unilateral decisions and we visited schools that, to me, were similar to Green Chimneys and unfortunately they don't have a school for every child, you know, kids that are fragile and have emotional problems versus kids that are acting out and throwing chairs at school, she didn't belong in that setting, that is what Green Chimneys was.

So her father and I separately he arrived in his own vehicle and I arrived in my vehicle but we toured a couple of schools. And one I believe we agreed that was not appropriate for more than one, but, like, this one specific time they were literally on the same campus. They deemed they, the school district, the school, said it was not appropriate for her. And then, one, I believe her father was also onboard that it was a

similar school to Green Chimneys, and, you know, we both agreed separately, not jointly, separately, that, you know, we didn't feel that was an appropriate placement. She was tutored at home for a period of time. Again, not meeting any social, emotional needs children have, you know, having, three different teachers come for 45 minutes, or whatever, to teach her math and social studies, et cetera.

Q So it was private tutoring for a period of time?

A It was by the school district provided it, while they looked for appropriate schooling an appropriate school for her.

Q And she went back to -- withdrawn. Your daughter testified she was at Longview from around the age of 11 to 12 and a half and then she was kicked out?

A Okay.

Q Does that refresh your recollection as to the timeline at all?

A Well, I think I mentioned earlier she was there three times. So, I don't believe I put her right in Green Chimneys. I believe it was trying to allow the school district to find an

appropriate school for her, but then we did work it out with Longview, and but, you know, she was she was suspended. And then, you know, she did not go back.

Q So I am just trying to get a timeline a little bit. After Green Chimneys, maybe she was home schooled for a period of time, but at some point after Green Chimneys, she did go back to Longview for about a year or so, year and a half, correct?

A Yes.

Q During that period of time, how was she doing at Longview?

A She had some good times there. Good experiences. Good educational, you know, experiences. But and I don't remember the specifics, but, you know, she did get suspended for not, like, following rules there. And she just had a tremendous amount of anger and emotional issues and these continued to manifest, and, you know.

Q Why was she kicked out of Longview or suspended, as you say, at around age 12 and a half?

A I really, like, the specifics, I don't know. It was just it was definitely, like, just not following their basic rules. But it was, it

was not a typical school. It was from, you know, you know, a student could write up another student for saying, you know, leaving garbage, like, on the lunch table or something, and you get written up and then you have to go to a meeting to say is your consequence for not being, like, part of the school community and cleaning up after yourself. It was geared towards, like, a democracy and, like, kids being involved in the judicial aspects of the school.

And like she would refuse to go to the meeting the very meeting that was, like, why did you leave the class when you became upset with that student or that teacher like and she wouldn't even attend, so you know I just, you know, vaguely remember, like, if you don't aren't going to abide by the rules and partake in meetings and those rules, they don't know ask you to leave, you know, if you're not being to abide by the community rules in the school.

So her emotional problems continued to be a problem, but I don't even remember if we were still involved in court. I do remember her father threatening to bring me to court over putting her back in Longview. And I just said okay if that is

what you have to do. I mean I was that is the last thing in the world I wanted for myself. It was traumatic for everyone.

Q What was the last?

A Can't speak for her father but.

Q What was the last thing that you wanted for yourself?

A To be dragged back in front of the family court judge. That, you know, that this dragged out for three years, which is my understanding is that don't want to say illegal, but 500 days, I was told by one of the attorneys that we could be audited and I would never get a fair trial with that judge if he got audited, because it dragged on for over 500 days, at that point, which that should never happen in family court, to me. So I didn't have control over that, and neither did my daughter.

Q You just mentioned your -- John was threatening to bring you back to court, about putting your daughter in Longview?

A Yes. Putting in her Longview, which he didn't agree with.

Q Okay?

A She couldn't be in public school. She

couldn't function there. She didn't Green Chimneys again was never put I regret leaving her there, as long as I did.

Q Okay. So John disagreed after she was home schooled for a period of time when you put her back in Longview around age 11 or 12 and a half, John was opposed to have her going to Longview?

A I believe so, yes.

Q Where did you want her to go?

A I don't think he had the answers of where she should go. He just knew where he didn't want her to go.

Q You made that decision to put her in Longview for the second time without his agreement?

A Correct. And I paid for it solely.

Q Again, you put her in Longview, because you thought that was the best decision for her at the time?

A It was, like, seemed, like, a, at least somewhat viable to not be sitting home and waiting for a 65-year-old man to come and teach her social studies for 45 minutes, yes.

Q Your daughter mentioned some sort of incident with a principal at Longview, I believe was there or a director?

A Okay.
Q Do you remember that?
A I think that was, I think, I don't know if that was the third time she was there. I don't know.
Q Okay. So then?
A But she butted heads. She butted heads with the director, who was also a teacher. He was, like, the founder of the Longview School. And the director and he taught classes. And she butted heads with him a lot.
Q After she got kicked out of Longview, at around 12 and a half, she was home schooled for about a year and a half, is that right?
A It sounds feasible. It was a very difficult time. I am with someone trying to work full-time. It was hard. I know she was there three times. And in between, we definitely were hoping the school district found an appropriate school for her. An appropriate program.
Q I know that a lot of these dates and times are iffy and fuzzy and it is hard to pin down sort of trying to get a general time line. Your daughter testified that she was home schooled from around 12 and a half to 14 after she got kicked out

of Longview. And then in the fall of 2017 she went back to Longview, does that refresh your recollection at all?

A No, I mean if that is -- I have to say I feel like she's more accurate on dates, like that. I don't.

Q Your daughter also testified that when she was home schooled during that period of time, between I guess second and third Longview school sessions, when she was home schooled, that was when she was 12. 21 years old. And that is when she developed the disorder of eating and anorexia?

A I think so. I remember leaving work early, coming home, and she was upset and, you know, crying, angry or, you know. Christy we were with Christy, and Christy was very concerned about her weight loss. So, you know, she was probably, I don't know, like, maybe, like, 13, 12, 13, in there.

Q After that first time that you found your daughter crying in the bathroom when she got her first period, did she have any subsequent periods?

A I believe my daughter has had three periods. And the second time it happened, she had

a very similar reaction, which was, like, a year later. She has been, she has had testing, medical, you know, and there is no discernable reason why she doesn't get her period. I mean, yes. But she definitely had, like, an emotional, meltdown, when she got her second period and third which you yes.

Q The third time she had another similar kind of emotional reaction to it?

A I mean maybe not as, you know, extreme as the first two times. And again, like, she was not much more than spotting at that point, so, you know, maybe if she had continued to have a full period. I don't know. I think I would be. I don't have a crystal ball.

Q Did Fox ever tell you that part of her eating disorder was to try to stop herself from getting a period?

A No. Never.

Q Was there ever any conversations with any doctors or with any mental health providers of Christy about the effects of anorexia on your daughter's period?

A No.

Q Were you aware of any sort of relationship, between anorexia and getting her

period?

A Oh, definitely. But the first time, I believe the first two times, she was a normal weight or maybe even considered, you know, at the top of the normal weight for her height and age or whatever.

Q And then after that, she developed the anorexia and disordered eating?

A I think around that time.

Q Did you ever have any conversations with your daughter where she talked about any relationship, between being lower weight and not getting period?

A No.

Q By the way, has your daughter ever been hospitalized inpatient for psychiatric reasons?

A No.

Q Have you?

MS. LONDON: Objection.

BY MS. KATZ:

Q Okay. I am only asking because there is a record from Melissa Marino that documents there was two stays at an inpatient psych unit. I don't know if that referred to your daughter?

A I don't believe that that is accurate.

Q Okay?

A I am racking my brain. She was, no. That is, I believe, a mistake.

Q Around the time that your daughter started having disordered eating, and the anorexia issues, around that time, is that also when she changed from Riverside to Bambini Pediatrics?

A I don't believe so. I believe it was later. I believe she has only maybe been there maybe three-ish, or so, four years.

Q Why did your daughter change from Riverside to Bambini?

A I really don't. I don't know. I don't remember what the motivation was.

Q Did you switch pediatricians?

A Well, it would have been me, yes.

Q So, you made that decision, as opposed to your daughter or was it a combination?

A I think I was just not happy with one of the doctors that had been there for a long, you know, most of her childhood or had left, and I think, I don't, he was definitely gone. But I don't think I think one particular doctor, you know, I kept bringing her back for the same issue, which was, like, swollen glands and severe

exhaustion, and like joint pain, and I don't know. Swollen glands for sure. And he just I don't know poo poo'd it several, I don't know. I don't even know that that was the final reason. I know I wasn't happy with Dr. Radkin (ph), at that point, because, like, we went three times before he did blood work.

And he was, like, oh, she had, like, mono at some point. I am, like, she still has swollen glands, she's still extremely tired, everything is fine, like the blood work is -- she did have mono at some point, like, isn't that symptoms of mono. Can we dig a little deeper. I wasn't loving him Dr. Baskind, at that point.

Q That was Dr. Baskind or Radkin?

A I think Baskind.

Q He was at Riverside?

A Mm hmm.

Q Okay. Did you consult with your daughter about that decision to switch pediatricians?

A Yes. Yes. By then she is 15, 16. She was older. I absolutely discuss things with her. And she was fine with it. She wasn't at the doctor a lot. I mean hardly ever, so it is not, like, we

had that, like, strong connection, and.

Q Okay. But she agreed with the decision to switch pediatricians?

A I believe so, yes.

Q And when your daughter started going to Bambini, at around age 13 or 14?

A No. She was older.

Q Oh, she was older?

A Mm hmm.

Q So did she switch to Bambini, before or after her top surgery?

A I believe right before, possibly, like.

Q Was there ever any conversations with Dr. Baskind or anyone at Riverside, about your daughter's gender?

A I don't believe so. I can't be positive. Again, it is -- you know, there were years that we didn't see them, like, I didn't have, like, I would call and say oh, we are experiencing this that, you know, she went for physicals by and large and occasionally when she was sick, so no. I have to say, no.

Q At any -- so as far as you recall, and I understand the dates are not perfect and that is fine, as far as you recall, she started going to

Bambini shortly before she underwent the surgery in December of 2019?

A I believe she was probably maybe 15 when we started there. 15. Maybe even 16.

Q But it was some time before her surgery?

A I believe so.

Q Do you recall discussing with anyone at Bambini, the proposed surgery?

A I don't believe so, but I am not positive. I mean, there was definitely discussion as far as, like, her -- her names, you know, the name that she wanted to be called and what was on her insurance card so they understood that this is someone who wanted to be called, you know, Fox Varian, or, you know, maybe it was Fox Basile, before she legally wanted to change it to my maiden name, so you know but I don't know I was, like, you know, asking them, for their medical opinion. I was listening to Dr. Einhorn, being I feel that a mental health issue more so than the pediatrician, weighing in, I mean.

Q Okay. When Fox started changing her names to various different names, did you ever consult for any second opinions with anyone at

Bambini, or at Riverside, about her gender, or her identify preferences, aside from what you already told me about the insurance and the names, did you ever talk to anyone about this means or whether or not there is testing that could be done or other evaluations?

A I mean, she went to, you know, a pride center, a few times, like, I mean I just wanted her to be him, at the time, I am guessing, to be comfortable in their skin, and be okay. It wasn't to question. I questioned Dr. Einhorn, that is who I questioned. No. I didn't really think about, you know, getting a second opinion. I definitely thought that for insurance purposes prior to the surgery, that we would be required to.

Q Required to what?

A To have someone other than one psychologist, one doctor saying he absolutely felt this was vital to her very survival, like, her identify, her mental health, her ability to be happy and not commit suicide. Like I didn't think it would be approved by the insurance. I thought there would have to be another evaluation, by someone other than Dr. Einhorn.

But I did question him and he told me

it was definitely in the 90s. He said percentage, like, 94 percent of people that identify as trans, never waver from that, you know, that was one of the I did question him. And by then, she had been seeing him for, you know, a couple of years, you know, or into a third year, so, you know, I questioned him. And he continued to be steadfast in explaining to me why it was absolutely necessary not just to her happiness but for him to not commit suicide that these kids in this, you know, teenagers, in general teens with anxiety and depression and then you add the layer that they are trans, and, you know, it is they are going to kill themselves if they cannot be in their if their physical body cannot match who they are.

Q You also ultimately consented to your daughter having surgery because you also at the time felt that it was important and necessary for her?

MS. LONDON: Objection.

Objection. Can you describe what you mean by consent.

BY MS. KATZ:

Q You signed a consent form for your daughter's surgery, correct?

A I signed a consent form, correct.
Q You agreed to let your daughter have the surgery, correct?
A I was not without reservations. And I expressed them repeatedly to Dr. Einhorn, who had his statistics and his information. And he steadfastly had to convince me. I did not initially, willingly, just get onboard with this. I was not onboard with this.
Q Okay. But ultimately, you did consent?
A Ultimately, I did.
Q You did that because you thought that was what was best for your daughter, right?
MS. LONDON: Objection.
BY MS. KATZ:
Q Can answer.
A Without Dr. Einhorn, this decision would never have been made for my child. Without his very intense pushing and giving me statistics, and her specific, you know, case, her specific feeling, you know, I had my reservations and he had to convince me. That is what I am saying.
Q Move to strike the portions --
A I wasn't.
Q Move to strike the portions that are

non-responsive.

MS. LONDON: Absolutely not. She responded to your question.

MS. KATZ: Hear the question back.

(Whereupon the requested portion was read back by the reporter.)

BY MS. KATZ:

Q You did that because at the time, you thought that was what was best for your daughter, right? True or false?

MS. LONDON: Objection, asked and answered. You just asked the same question again. She explained why she agreed.

Q I know. I am not asking for an explanation. I'm just asking for yes or no. You agree because at the time you thought that was best for your daughter, true?

A I answered the question to the best of my ability, already.

Q Answer it true or not. That is true statement?

A I answered your question.

MS. LONDON: Objection you can't

tell her how to answer. She answered the question, like she said, to the best of her ability.

MS. KATZ: I can ask her.

MS. LONDON: Just because you like the answer doesn't mean that you don't like the answer doesn't mean you can feed her an answer.

MS. KATZ: I am not feeding her an answer. I am asking hear a true or false question.

MS. LONDON: You didn't say true or false. So said you agreed. She said yes and she explained why she agreed.

BY MS. KATZ:

Q At the time, you thought it was the best decision for your daughter?

MS. LONDON: Objection, asked and answered.

(Ruling.)

BY MS. KATZ:

Q We'll mark it for a ruling. Ask another question. At the time you agreed to let your daughter have the surgery, were you concerned that she might commit suicide, if she could not

have the surgery?

A Yes.

Q Had she told you that?

A Yes.

Q How many times?

A It was an issue prior to this issue coming about. Again, him saying, depression, anxiety, just being a teen with emotional issues. She has got all of these, and then now you add that she needs to have this surgery. I felt like I am going to come home from work and my child was going to have killed herself. And that was information given to me by Dr. Einhorn.

Q My question was --

A I answered the question to the best of my ability.

Q My question was not what your daughter told you. Not what Dr. Einhorn told you.

A I answered that she talked about suicide.

Q Right. Right. Right. How many times had your daughter told you?

A I think I said, I really don't know.

Q Didn't answer that?

A I think I said, I am not sure. It was

an issue even prior to this gender issue.

MR. BUGLIOSI: First time heard that testimony.

BY MS. KATZ:

Q Ask you this, listen to my question, had your daughter told you on more than one occasion, that she was going to kill herself, if she could not get top surgery?

A Yes.

Q How many times had she told you that?

A I don't know how many times.

Q If you know?

A How many times. I don't know how many times. More than once. More than twice.

Q More than five times?

A It was an emotional mess. I often got calls at work, with her crying, unhappy in life, unhappy in her own skin.

Q Did she tell you that she was going to kill herself, if she could not get top surgery more than five times?

A I can't accurately answer that, because I don't remember.

Q More than ten times?

A I don't know.

Q Did you ever talk to John about your concern, that your daughter might commit suicide, if she could not have the top surgery?

A John?

Q Basile?

A John Basile and I rarely, if ever, communicated directly. And that was, I believe, his decision. He was not seeing his daughter, at that time, so we really did not have much of a reason to discuss things. And he did not want to he did not want to be part of her life, at that time.

Q Did you ever communicate, via text, that you were concerned that if she could not get a top surgery, she would kill herself?

A I don't believe I communicated that to him.

(Whereupon, a discussion was held off the record.)

(Whereupon, a recess was taken; whereupon, the deposition resumed at 12:31 p.m.)

BY MS. KATZ:

Q Now, around the spring of 2017, Christy referred your daughter to Carmel, is that correct?

A 2017? Is that what you said?

Q Yes, is that correct?

A I don't think. I think it was before that. I am trying to do the math. She was maybe 13. 12, 13. At that time. That she stopped seeing Christy, I believe.

Q If I told you the records reflect that she first your daughter first saw Dr. Einhorn in June of 2017 at age 14, does that refresh your recollection?

A We didn't go right into seeing Dr. Einhorn. Christy recommended maybe that, you know, her -- our conversation was, you know, I think you're doing a good job, mom, I think I am doing a good job, as well.

But I don't see Bella getting better so I am going to recommend, you know, that you see somebody else, so I don't know. I don't remember if she, herself, said pharma psychological, but I vaguely remember a conversation with someone there saying, well, what is it that you want.

And I said, you know, that my daughter needed another therapist. But that she wasn't succeeding in school. She wasn't succeeding in social settings. She, you know, and I just wanted

some answers. They did a battery of testing, that it was a woman. I don't remember her name. She was a psychologist or a psychiatrist. She might have been a psychiatrist, there. I think she was a psychologist and she when I expressed to someone like in the intake process, what, like, what the issues were, they did testing. That that indicated that she was on the spectrum, and I don't know maybe some other things, but that was the predominant finding. And then that particular woman said, I feel, like, you know, your daughter would be a good fit with this doctor. And, you know, and we went from there. Whether I had to call again, make an appointment, we were connected with Dr. Einhorn.

Q The psychologist or psychiatrist at Carmel that diagnosed your daughter on the autism spectrum, was that the doctor who recommended medication for ADD or was it someone else?

A No. That was -- that was quite some time earlier.

Q Okay.

A Definitely not the same person.

Q Did the person at Carmel recommend any medication for your daughter?

A At that time, no. I don't believe so. We were, we were, I vaguely remember being asked, so what is it that you want us, you know, like, you know, like, now you have a therapist that's, like, saying, I have done my best. I feel, like, it is not enough. So I said, like, she is not having a successful life in any way, shape or form,, you know, like, so, you know, we agreed, it was suggested.

I don't. I certainly didn't say, I want a battery of tests done. I think feel like they must have said, let's do some further testing, and those were some of the findings was that now they felt, that she was on the autism spectrum. I thought we will get some help for that. We will get, you know, a piece of the puzzle, is in place, and, you know, hopefully, now, you know, like, we can address this, and, you know, things will get better.

Q So, up until this time -- withdrawn. So, you mentioned that at this time, the doctor who diagnosed your daughter with autism, at this time, that doctor did not recommend medication. Was there a later point where someone else recommended medication for either anti-anxiety or

antidepression?

A Probably Dr. Einhorn.

Q Do you remember him suggesting that?

A I believe so.

Q How many times did he recommend medication?

A I don't recollect. I know that it did come up in discussions.

Q More than once?

A Probably, yes.

Q Was that discussions you had with him in person or over Zoom or over the phone or?

A Probably in person, you know, a couple, like I said, I initially was in the sessions for all, initially. Because my daughter was not comfortable with people in general, less so men. So I took part in the sessions. And then I kind of weaned off where we might bring up issues happening in the beginning and then I would leave, and let them, you know, address stuff that my daughter clearly wasn't comfortable discussing with me, which is fine. That is what a therapist, hopefully is going to address.

Q So, and do you remember the sum and substance of the conversation with Dr. Einhorn

about potentially taking medications; like what he said to you, what you said to him?

A I feel like he felt that, you know, if we addressed this part of, you know, some of her difficulties, that you know it would be helpful. At that point, my daughter was very outspoken for herself.

Not going to pry a child's mouth open and force them to take a pill. She eventually tried a medication that Einhorn and again, I don't even it wouldn't have been him, I don't. I don't know. I take that back. I mean, he is a doctor. I don't know if he saw someone else, that prescribed a medication. But she tried I believe, like, an antidepressant, that also addresses maybe the anxiety issue as well. And she did not have a good experience. She felt very sick from it and didn't want to take it.

Q When you said she eventually tried medication, do you how long, at what point that was, you know?

A I don't remember. It was just while seeing Dr. Einhorn.

Q Had that been after numerous conversations with Einhorn about potentially taking

medication?

A He definitely suggested it, you know prior. I mean I wasn't against it or for it. We looked into it, and ultimately, you know, Fox was initially not willing to take something. She didn't want to take something.

Q Fox told you she did not want to take it?

A She did.

Q You felt that she had the ability to make that kind of decision for herself, at that time?

A I didn't always agree. But again, I mean we are not talking about a five-year-old, we are talking about a 15-year-old.

Q When Einhorn suggested she potentially take some medication for antianxiety and antidepression, and she made the decision that she did not want to do that, you felt that she had the decisionmaking capacity to make that determination on her own?

A I'm not saying I agreed with it fully. I had discussions outside of speaking to Dr. Einhorn. Unless I was going to physically force her, which was not going to happen, you know I had

to honor what she wanted to put in her body and what she didn't want to put in her body. I am not saying I one hundred percent agree with pharmaceuticals. There comes a point where I agree that she should try. I agreed with him.

Q You said you looked into it? You looked into various medication?

A Not various. I just I mean I know they are not without their side effects, and, you know, dangers I mean certainly if he suggested a particular one, which I think he did. At one point, she tried a particular one. And there were others, that should could take. And that is what we both said when she said she I truly don't even remember. It wasn't just nausea. She had she really did not feel well on it, for the several days that she was taking it. And I don't know what he wrote. At that time, I feel that he agreed that that was not going to be the best fit if she had a reaction that she did but.

Q Before -- before she attempted to take a medication when you and Dr. Einhorn had these discussions, where he was recommending she try a medication, you mentioned you looked into it. So what did you do to look into that?

A I am pretty sure I was already aware that there are significant side effects to those medications, so I didn't research it. I totally agreed with Dr. Einhorn with when your symptoms are prohibiting you from taking part in every day life and being somewhat okay, you know, we can strive to be happy, but at least be okay. I agreed with him, that she should try some medication. And at one point, she agreed, and again, I don't remember which, there is a, you know, many many many different drugs in that category of antidepressant and she tried one of them.

Q If I told you that the records reflect she first saw Dr. Einhorn in June of 2017, at the age of 14, obviously she had just turned 14 a month or so?

A Okay.

Q Does that sound correct?

A That sounds correct. I know there was a gap between Christy and Dr. Einhorn because there was testing and it takes, you know, took time.

Q So, when she first started seeing Dr. Einhorn in the fall of 20 -- withdrawn. When she first started seeing Dr. Einhorn around June of 2017, at that point how often was she seeing him;

was it once a week, was it more than that?

A I believe, it was once a week.

Q And would you, you were present for all of those initial visits?

A I was present for a lot of the sessions.

Q So, from let's just say June of 2017 when she first started seeing Einhorn, up until the following -- the following year so June of 2018 okay. I believe she had started back at Longview, in that fall. Does that refresh your recollection?

A Yes, it does.

Q Okay. So during that year or so from June 2017 to approximately June of 2018, throughout the summer, and then over the course of the school year, at Longview, she was still continuing to see Einhorn weekly, is that correct, as far as you recall?

A I think there -- it might have been later. It was every other week. But I don't that I don't know. I don't know if it was, like, a full year that she saw him every week. I mean, she needed it, so I believe there was a significant amount of time where it was weekly.

Q Okay. And do you remember what was

discussed during that first year of treatment with Dr. Einhorn?

A I don't know. Just the school issues. The issues that she was having, with Mr. Jacobs, the director at Longview, you know, I remember Dr. Einhorn, commenting, like, that he had spoken to him or actually maybe it was an e-mail. And one of the stipulations that Fox was accepted back into Longview was that, you know, that he would be in contact with Fox's therapist, because of the issues she had prior and that he wanted to be privy, you know might be not to the discussion, but that if there were difficulties at Longview that he had the contact to be able to communicate with the therapist. And I vaguely remember just feeling a little bit validated when Dr. Einhorn just said oh, I don't even need to answer that e-mail. I have got his number.

He is getting into a power struggle with a 14-year-old girl. So, we can also play hindsight and hindsight when Fox was not successful again. I just wish again in hindsight that Dr. Einhorn, had rather than just like, oh, I just totally dismissed that e-mail I have got this guy's number really he is just, like, butting heads with

a 14-year-old girl that has emotional problems.

And I was just, like, yes. He sees, that you know what my daughter kind of is up against. That like some of the adults, like, you know, maybe, you know, just can't see the forest through the trees. I don't know. Basically then hindsight, I was, like, you know, if he had maybe, communicated with Mr. Jacobs and tried to smooth the path or something, or address the issues, that there was some butting of the heads and the power struggle, maybe he could have gotten through to Mark Jacobs, maybe she could have been successful.

I remember feeling relieved that someone kind of saw Mark Jacobs maybe not fully not honoring but like basically Einhorn's assessment was he was getting into a power struggle with a 14-year-old girl that had emotional issues.

At that time, like I said, hindsight isn't it always 20/20. So, I was present for some of the sessions. And then Dr. Einhorn and I definitely communicated when there was issues whether it be at school or at home.

Q So, during that first year of treatment with Dr. Einhorn, do you remember discussions between your daughter and Dr. Einhorn, about some

of her feelings about getting her period, and being comfortable with that?

A No, not her period no.

Q Do you remember any conversations during that first year, with Dr. Einhorn, where your daughter expressed being unhappy with the female body?

A I wouldn't say it was directly the female body. She was definitely, there was confusion, you know, she changed her name to Gabriel, she changed -- I am trying to think, like, what other. Rowan, you know, like, we were doing the name changes, and, you know, but and then yes I guess she started binding. And, you know, at the time, I was thinking I am glad that she has someone that she feels comfortable to discuss these things with, because she definitely doesn't feel comfortable expressing them to me, because it would kind of more kind come from like him kind of saying this is where we are at. This is what they are talking about.

Like there is this good program down Putnam Valley at Panas High School. It is a special ed program, and I think Gabe or Rowan would do well there. And, you know, it is just and then

there was lots of trans kids, there. And again, I'm hoping, like, you know, they can get a high school diploma, and have some semblance of a normal school experience. And make some friends. So that is what was happening, like, at that time.

Q So when you say at that time when did the issues about the name change, or I guess, the name change, and when did the name changing and the binding start and if it is different times, I guess you can separate it?

A I don't know really know. Somewhere in there. I would say it was culminating in the age, the year that she was 15. I can't say definitely that she was binding at 14. I don't know. It is possible. I don't recollect, but it was definitely definitely at 15. And she was at the Oasis program, that like I said, Dr. Einhorn had recommended that program. And, you know, versus her school district I guess looked into it, and she started, you know, the Oasis program when she was 15 and she was there for a year.

Q Okay. Let's just go back, because the first year, that she was with Einhorn, she was at Longview, right?

A Okay.

Q That first year, the school year from the fall of 2017 to around the spring 2018, that was when she was 14, that year, during the sessions with Dr. Einhorn, were there any discussions about menstruation, a female body, gender, issues, name change, was there anything any discussions about that, that you recall, during that year?

A I think probably. I can't say definitively, in those couple of years. I mean, yes, this was happening, you know, the name changes, you know, I didn't buck any of that, like, I want to, like, support my daughter, and, you know, it was a process. I don't, like, not saying Bella by mistake. She would get very upset and.

Q Did she change her name or did you help her change her name on the forms or with anyone at Longview?

A Definitely. Like, I was totally being supportive. And again, like, was it a phone call with Mark Jacobs, was it with some of her teachers, like, I don't remember, they were supportive of calling her, I guess "Rowan" or "Gabe," I think it was Gabriel for a short time and then it was Rowan, I remember thinking oh Rowan can be, like, either one. So maybe she is I was relieved I feel, like,

okay she is just kind of feeling ambiguous. She doesn't really know that could be a boy's name or a girl's name, you know, but.

Q And so you had had conversations with various either teachers or administration about changes?

A Yes.

Q Did you have conversations with anyone at Longview about her preferred pronoun?

A I don't recollect, but I can say if Fox said it, if Rowan said it, like, they honored it, it wasn't, you know.

Q Did you ever have any conversations with anyone from Bambini Pediatrics about your daughter's name changes or pronoun?

A Yeah. It was just a matter of, like, this is what they want to be called when they come here, this is what is on their insurance card. Again, it wasn't, like, this is what they want to be called, so please, please respect that, and.

Q So, if you can, and tell me if you can't, that is fine, do you know which occurred first, the binding or the name changes?

A I think the name changes.

Q Okay?

A I think she was definitely, no I can't that was my gut reaction to say. If I really think about it I am not positive.

Q Okay, that is fine. Do you recall if your daughter was binding during that year at Longview, from the fall of 2017 to the spring of 2018?

A I don't remember but I feel like it was at Oasis, but I am not positive.

Q What happened in the spring of 2018 that led her to leave Longview?

A I don't remember the specific incident, but again, it wasn't in the forefront of my mind, at that time, but she continued to butt heads with the director, who was also one of her teachers, and I believe she got suspended and it just it wasn't working. And I am going offer it again. I feel like, Dr. Einhorn, could've done more, to facilitate their communication. He is, like, I got his number. I didn't even answer the e-mail. That is what he did. I felt validated at the time, it didn't help my daughter to have a successful educational experience at all. If intervened rather than say, I ignored that e-mail, I got his e-mail.

Q This conversation about, Einhorn speaking to someone at Longview, speaking to Mark Jacobs, was it one conversation or was it more than one?

A I believe Mr. Jacobs reached out a few times with my daughter's, issues and Einhorn didn't really, he just kind of an eye roll, like I got this guy's number. Why is he taking inventory of a 14-year-old girl. And, like, instead of, you know, like, this is a school that a private school that you have a lot of kids that have emotional issues.

They don't fit in like at the mainstream public schools, so there is a lot of kids, similar, kind of light box with learning disabilities, and some emotional stuff.

So I, like I said, at one point Mr. Jacobs wrote a long e-mail, you know, that was his response that he is, like, getting into a power struggle with a 14-year-old. I was like hello? I feel like he had done more. That was in hindsight. I remember feeling relieved that like someone else sees it is fruitless to like just get into this butting heads with a 14-year-old kid that has issues, so.

Q Move to strike the portions that are non-responsive. What I wanted to know is just the conversation that you had with Dr. Einhorn, where he discussed where he said I didn't respond to that e-mail. I got this guy's number. Was that one conversation or was there more than one conversation?

A It seemed, like, it was that particular time. I feel like maybe he did have, I don't know if it was a phone conversation or an e-mail with Mark Jacobs but I feel like there was some contact prior because Fox was struggling in life, whether it was home, school, here. He definitely she was having the issues. And I feel like this was more than just that one contact.

Q How many times, did you speak to Einhorn; was it just one conversation, where he said oh, I got his number, not responding to the e-mail or did that conversation occur between you and Einhorn, more than once?

A Probably, I can't say definitively but, you know, definitely more than once. Fox was having issues at Longview, you know, in general. But a lot of incidents were with this teacher, who also was the director. So, it definitely came up

with Dr. Einhorn, of her repeatedly struggling at school.

Q Okay. I think I'm asking a specific question. I think maybe it's just you're misunderstanding it. What I just want to know is, the conversation where Einhorn basically, you know, said did wasn't going to talk to Mark Jacobs, how many times did he say that? Was it just that one time or?

A That particular time, but I feel, like, there was at least one or two other episodes, where there was e-mails between the two.

Q Those other times he did communicate via e-mail?

A I think he may have. Whether it was a phone call or they e-mailed, but Mark Jacobs specifically wanted Fox's therapist's information, in case there were bumps in the road. And that was one of the terms of him agreeing to allow her back to the school for the third time, was being able to access and communicate with her therapist. And I believe there was communication prior to that last, like, long e-mail where he was just, I guess going on and on about all of Fox's issues and he kind of was dismissive of it, after Einhorn, was dismissive

of it.

Q Had you had -- withdrawn. Had you had meetings with Mark Jacobs about your daughter's issues at the school?

A Yes.

Q Okay. And what was the sum and substance of those meetings?

A I was just basically trying to advocate, that, you know, to please not give her a free pass, on abhorrent behavior. That wasn't happening. But just to understand, like, her diagnoses, the ADD, you know, the emotional problems the custody thing that had changed my daughter from a happy playful easygoing kid that wasn't riddled with depression and anxiety. That was 6 and 7. I don't know what was going to come to pass.

I can tell you having visitation changed repeatedly, repeatedly voicing what she wanted and no one listened to her including the law guardian was supposed to advocate what Fox was expressing, coupled with reports and psychological information, no, you don't give them to a parent that is not fit, meaning, she was not being heard and she was extremely, you know, becoming she was

riddled with anxiety and depression that was morphing into a very very angry unstable person, young person. And I wanted Mr. Jacob to understand some of the things that she had gone through. And he saw a lot of these types of kids come through a school, like Longview.

Q Did you have good relationship with Mark Jacobs?

A I wouldn't say it was good. I wouldn't say it was bad. I mean, I that is why I said I was a little relieved when Dr. Einhorn somewhat validated what his opinion was and that might have been true. But again, much later down the road, when there were other signs, you know, I was like, Dr. Einhorn did do her any favors by just being dismissive of this person. Maybe if he had worked with all of us, and put some time in and considered a paid session, maybe we could have gotten through some of these bumps and she could have stayed at Longview and graduated.

Q So in the spring of 2018 was your daughter suspended from Longview, was she kicked out, did you pull her out, what happened?

A I believe she was suspended. But it was directly relate to issues with Mark Jacobs.

Q What do you mean by that?

A I was, I was, I was having I was advocating for Fox, and he was bringing his personal dog, that when Fox who loves animals, was like I don't like this dog, like it jumped up and tore my jacket when it tried to nip me. I am literally arguing with the director of the school like we love animals. But like your dog doesn't belong there. I kind felt how other people. That is where I got information, like, he has nipped other people. You know so it was just surreal. I am arguing with a person with a dog that isn't, like, a certified emotional support animal, or something, like, so, yes I tried to make it work. I didn't I feel, like, I tried to communicate with him and it wasn't, it wasn't animosity, there wasn't open arguing, but, you know, I again go back to Dr. Einhorn, kind of seeing kind who this guy is I am not crazy.

Me butting heads with him hey can you be a little more understanding of where my daughter is coming from and some of the difficulties. She got written up for this, she didn't go to the meeting. Like does she have to be suspended for that. Can she try to navigate and try to make this

work and it was untenable. That is what it came down to.

Q Okay. So, did the issue with Mark Jacobs' dog have something to do with her getting suspended?

A I think indirectly with her, like, just butting heads with him and getting written up by him and having to go to the JC, judicial committee meeting by him and she refused to go, so yes.

Q Now, your daughter, do you remember how your daughter was doing, between the time that she got suspended from Longview in the spring of 2018 and the time she started at Oasis, the following fall?

A Do I remember? I don't know specifics but I know this is I feel, like, you know, she is reiterating that she is miserable, that you know, like, we see the eating disorder, you know, like, she might be eating more and not might gain some weight. All these, like, eating issues, controlling, you know, when and how much and discussing food, like, she still had a lot of issues, you know. I went to work wondering, you know, you know, I definitely got calls at work. I definitely had to leave work at times when she was

having meltdowns when she was just emotionally all over the place.

Q Over that spring and summer of 2018, do you remember what name your daughter was going by?

A I think at, well, I think at Oasis, she went from maybe Gabriel briefly to Rowan. I believe she was being called Rowan there.

Q Did there come a time that she cut her hair short?

A Yes.

Q When was that?

A I don't know.

Q What?

A I don't know.

Q Was it before or after she started Oasis?

A I think after, but I can't I don't know positively.

Q Did there come a time where she started dressing in more masculine clothing or androgenous clothing?

A She was never, like, a frilly dress kind of, but definitely androgenous.

Q She was never a frilly dress kind of person?

A No, I mean when she was tiny, I mean it is not my style I am wearing a gray t-shirt, so she had some pink dresses. I am talking very little. I didn't thrust upon her, like, she never had a little skirt. She gravitated towards Ts, leggings, jeggings kind of thing. She was never, like, super frilly but you know.

Q Did there come a point that she started dressing more like a boy?

A Yes, I feel that was at Oasis, but I mean, you know, she definitely, you know, definitely before Oasis, she was, you know, saying she was non gender conforming or nonbinary.

Q Then did there come a point where she changed her pronouns?

A Definitely. I don't recollect exactly when it was.

Q Okay. Do you remember when she started Oasis, what her pronouns were?

A No. I know there, she would get very upset when people would misname her and mis gender her, you know, like if it was in place, like, right in the beginning of the year. I don't feel that it was, but I am not positive.

Q Okay. She started at Oasis, at the age

she was 15 at that time, right?

A Yes, I believe so.

Q Okay. Do you at some point does your daughter talk to you about ordering a binder?

A Yes. I mean, we definitely, I think, you know, we, I don't know, I feel like she was initially wearing, like, two tight sports bra, and then something, like, specific, like, a binder we, I don't know how old she was probably, you know, 15 into 16, maybe.

Q When did she start wearing the two tight sports bras?

A I don't know.

Q Do --

A 15 or 16.

Q Do you know how long she had been wearing two tight sports bras before you ordered her a binder?

A No. But she herself told me it's not quote, unquote, "healthy" to do that. So, you know, I wanted to get her something you know that I don't know was more specifically made for that. I don't know. Still I guess not a good thing to be binding, basically.

Q So, for how long had your daughter been

wearing the two tight sports bras, prior to her actual top surgery? For how long had she been either binding or wearing tight sports bras?

A Maybe a year maybe, maybe a little longer. I don't know.

Q Forgive me if I asked this I honestly don't remember. Did I ask you when you ordered her a binder?

A You mentioned, did I. I don't remember when.

Q Okay?

A I remember going to Dick's and getting the sports bra, but then at some point after that, like, she wasn't 13, I mean she wasn't the binder probably wasn't 14. It was, you know, like, more, like 15. It was really, like, coming to a head, like, this is who I am, this is who I need be, that was more, like, 15.

Q So you any you ordered a binder probably when she was at Oasis?

A Like, probably I could say.

Q Before she got the binder, was she wearing the two tight sports bras, for how long?

A I don't know. I don't know.

Q Would it be fair to say she had been

wearing two tight sports bras for a year, at least prior?

A No.

MS. LONDON: Objection. She just said she didn't know.

MS. KATZ: I'm trying to probe, to see more if she recalls more specifically.

BY MS. KATZ:

Q Was it less than a year?

A Sorry. I need to plug this computer in. I want to answer honestly. But I can't because I don't recollect.

Q That is fine. It is fine if you don't recollect. Trying to see what you do and don't remember. I am not I don't want to force you to answer something if you don't remember, that is fine.

Is it fair to say, you don't know if she was wearing two tight sports bras for a year -- finish the question.

Is it fair to say you don't know if she was two tight sports bras, for prior to getting the binder for a year, more than a year, or less than a year?

A Yes, I couldn't say with any certainty. Excuse me for one second. Apologize.

Q Mentioned at some point you went to Dick's Sporting Goods and bought her a sports bras?

A Yes.

Q Is that because she asked you to?

A Yes. I mean, I wasn't doing any of this without her expressing to me what she was feeling and feeling she wanted and needed?

Q What did she say about why she wanted the sports bra?

A I knew why she wanted. She was saying I am not comfortable in this body.

Q What did she say specifically about that?

A I really like I can't say specifically. Through conversations I was aware that she was feeling, you know, like, body dysmorphia, you know.

Q So, when your daughter told you, like I want to get these tight sports bras I don't feel comfortable in my body, did she say I don't like my breasts, I don't want breasts, did she say I don't feel like a girl, I feel like a boy, did she say both those things?

A I feel like in some maybe not verbatim,

that. That was, you know, what was being expressed to me by her, but obviously and Dr. Einhorn was you know communicating, that this is what was evolving, you know. We definitely had conversations. We definitely, you know, if I started out in the beginning saying oh, we had this night about this. She is very disrespectful she cussed at me. We discussed like you know that and maybe they have their session, and then he'd say mom if you can come back in, I want ten minutes with you, maybe we would discuss, you know, further, what she was conveying to him.

I have to say, you know, I felt, like, she and I were close, although, you know, this constant, you know, emotional meltdowns and talking about suicide and, you know, you know, being called from different schools to come and get her, to issues, whether it was Green Chimneys or Longview or, it was a constant thing and I went from being very close to her, to still close in certain ways, but I felt that she was very comfortable with Dr. Einhorn, because she discussed things with him, that I wasn't privy to.

Q Okay. So but aside with conversation you had with Dr. Einhorn, you also spoke to your

daughter one-on-one about her feelings about her breasts and her body, is that right?

A A lot of information came from him, so I didn't say when she came out, like, well, you know, Dr. Einhorn texted me this or we spoke briefly on this. Is this how you're feeling, like, I mean felt, like, sometimes it was pulling teeth to get her to communicate with me. She was very vocal about. But her sexuality, and her body, like I often got that secondhand you know from whether, you know, from whether it was Christy or then, or then Dr. Einhorn.

Q What did you get firsthand from your daughter about her body, and her wanting to wear sports bras or wanting to bind?

A Like, she would say, like, she would say these are too big. I don't like this, and, you know, I want to get a sports bra, like push them. I was, like, okay, I understand. It wasn't this long drawn out thing. I tried to honor what she was experiencing at the time.

Q Did she tell you she did not feel like a girl?

A I don't remember, like, I don't remember if that if those words actually came out

of her mouth like, like, that.

Q Did she say she wanted to be a boy?

A Yes, I mean she must have, yes, like, here we are, my daughter has no breasts so yeah at some point, you know, and these were not easy conversations. I will go back to it. A lot of it was talking to Dr. Einhorn, because she, in my opinion, seemed to feel comfortable talking to him about things, that she wouldn't talk to me about, and it wasn't because we didn't support her me and my husband she just still wasn't comfortable and maybe she saw it very painful for me. It was very painful.

And maybe she saw that and didn't want to see me in my face and my eyes, but see me yes her okay yeah I understand. No. I didn't. But I said I did. And it was painful, so maybe that's maybe I don't know.

Q Okay. Did your daughter tell you one-on-one, that she did not want breasts?

A She talked about having surgery, so I don't know that she ever said, I don't want these breasts, but like, when she talked about top surgery, I know what that means because she would talk about it. We went to a group a TransParentcy

group. For parents and trans kids, and so I was hearing the jargon and the, you know, and the different procedures and the different, the process of, you know, parents were experiencing with their children. I don't know. I tried to support her but that particular I don't want my breasts, like, I don't know that she specifically said that.

Q Trying to understand like even before, before she started talking about the surgery, before started that came up as a topic of conversation, when you say to go buy the sports bras, at around that time, did say to you I don't want breasts or I want a flat chest.

A I want a flat chest is probably more kind of what she was saying.

Q Okay. Now, when your daughter started at Oasis, in the fall of 2018, did she continue through that whole school year, through the spring of 2019?

A Yes, I believe she completed a whole year there. It was challenging. There was a lot of same issues.

Q Throughout that year, she had changed her name a couple of times, I think first Gabriel and then to?

A Rowan.

Q Rowan, right. And she changed her pronoun, throughout that year, as well?

A Yes, I believe, to they and then him he.

Q Throughout that school year -- withdrawn.

Throughout that school year at Oasis, from the fall of 2018 to the spring of 2019, how often was she seeing Dr. Einhorn?

A I feel there was a time that he said he could see her less, but I don't I doubt it was in that time, because it was quite, you know, still quite challenging so I think it must have been maybe after.

Q She was still seeing him, approximately, this is all approximate, but during that year at Oasis, she was still seeing Einhorn approximately on a weekly basis?

A I believe so.

Q Were you going with her, still, on a weekly basis?

A I would bring her. I didn't go in.

Q Okay?

A Always. No. By then, she had a pretty

longstanding relationship with him and, you know, I certainly didn't go in regularly to the sessions.

Q Okay. Throughout that school year, at Oasis, how often did you go into the sessions with Dr. Einhorn?

A No idea. I don't remember. I had conversations with him, but I don't remember.

Q Was it more than three times?

A No.

Q Do you remember ever going to session with him, during that school year?

A I would probably say, yes, I did, but I mean, sometimes it was texting. Sometimes it was just I would request, like, I am going to come because again it was just lots of struggles, lots of struggles, so I want to recap like, you know, like, this meltdown, and, you know, fighting and you know try to get some input from him.

Q So how often did you speak to Dr. Einhorn, during the course of that school year?

A I mean, I can't say with any certainty. I mean it really was quite a few years ago. I had a relationship with him. I had communication with him. How frequently, I don't know. It wasn't smooth sailing. I can tell you that. There were

times if I spent ten or 15 minutes of her session, or, you know, or I texted him after to say, like, you know, you know, like, did you address this because this happened or might have it wasn't there was never a time, that I felt, like, you know, she was in a good place, things were just going so smoothly. It wasn't happening, so I had, I had communication with Dr. Einhorn, on a fairly regular basis. Whether it was over the phone or via text or that I came into a portion of the sessions that was happening.

Q So you spoke him via text, phone, or sometimes in person, regularly, throughout the school years when she was at Oasis?

A Like, I mean, I can't say weekly. I had communications with this. Yes. My child was 15, 16 and having a lot of difficulties in her life, so I had communication with him. I cannot report if it was weekly, monthly, every other month, I just don't know. Probably not every other month. But I would feel it was more frequently than that, that is the best I can say.

Q How many times did you talk to Dr. Einhorn in person, you personally speak to Dr. Einhorn in person, about your daughter having

surgery?

A I don't. I have no idea.

Q Was it more than once?

A In person, probably but I can't say with total conviction. I don't know. I recollect, you know, him it was in person. Him giving me the statistic of, like, I believe it was like 94 percent of trans people, like, don't, you know, wake up one day, and think they made a mistake. Like they believe they are trans and 94 percent of people are trans. And, you know, if he gave me a statistic of the suicide rate, he just conveyed that it was even higher than it was for her already being a teenage, already being a teen with depression and anxiety. And then you added another layer and like she was just, like, so at risk of committing suicide.

Q This?

A That was in person.

Q That was in person. That conversation about the suicide, percentages, that was one conversation in person that you recall?

A Mm hmm.

Q Yes?

A Yes.

Q Okay. Do you recall any other conversations in person with Dr. Einhorn, where you discussed surgery?

A In person, no. It is -- I feel like it probably happened, but I can't attest that it was. Certainly there was communication.

Q Okay. So the other conversations that you had with Dr. Einhorn about your daughter undergoing top surgery, what was the form of those communications; text, e-mail, phone?

A I didn't e-mail Dr. Einhorn. I don't believe, maybe not never. I am not an e-mail person. I don't generally, so I can't be a hundred percent of positive but, you know, I remember if I believe it was probably a phone conversation, but it could have been in person, saying I feel like I don't feel comfortable with this decision, you know, I feel like, you know, here we are. This is a child that has had nothing but issues, emotional issues, you know, learning disabilities, all kind of emotional issues, this isn't a happy person, saying this, like, I am successful in relationships, I have been successful in school, you know, but this, I can't get away from this. I feel like I am in the wrong body. It was just a

shit show from start to finish. I was saying this child has so many emotional problems and trauma I really feel like that is what is happening. He was again he would reiterate the statistics; the 94ish, 93, 95, like, you know, I'm going to lie. It was definitely the 90s. I feel like it was the lower. Wasn't, like, 99 percent. He would give me these statistics on the suicide, and -- and -- and, you know, that she is sure of how she feels and I have another trans person, this, a client, and, you know, I seen this before, and, you know, like, like, he wasn't saying I am, like, I have like tons of experience. He would refer to a couple other clients that once they did this, that was the missing piece. And once they had this surgery, like, you know, it, it, you know, they were happier in their skin and their life could proceed from a better point, a better place.

And so, that he spent, you know, more than one conversation. And certainly, I won't lie, you know, there was my daughter telling me, you know, much later, when she realized that, you know, if she had made a terrible mistake, but, you know, she reported to me that, you know, she felt that, you know, he did the same thing to her, that he

later did to me, which is to convince her, that this is who you are, this is why you can't be happy. This is why you have all these emotional problems because this is who you are. You are a boy. You are in the wrong body. Don't you see that. You're freaking out about your menses, you know, she reported this much later to me, but I can tell you, after the surgery. And, like, all the same stuff, the eating issues and all these things I was, like, this was supposed to quote, unquote, "fix all this" and it didn't. And I put my faith and my trust in someone.

They had a years long relationship at that point. And she confided in him in things she wouldn't confide. Over time, trust was built, and I acquiesced, I yielded to someone who had credentials after his name. And he spent a lot of time and effort convincing me that this is what my child needed.

Q You mentioned that there was one conversation with Dr. Einhorn that you can recall, that you talked about surgery and you referenced the statistics. And then you mentioned one that conversation in person, do you know how long that was? That one that you specifically?

A I believe my daughter was present, so it was during a session. He spent four hours twisting my arm. It was in a session. I brought up my concerns. He was trying to allay my concerns, with statistics and facts and things about my child that he -- she conveyed to him and this is what she needs to happen. This is who she is and this is the missing piece, that she needs.

Q I am just trying to get an estimate as to the time of that one conversation? Trying to get an estimate.

A 60 seconds, probably not. An hour, no. I don't know.

Q Less than a hour?

A We did not spend, like, her whole session. Like him trying to convince me. It was process of him giving me facts.

Q I am just asking for a timeframe.

A I feel like.

MS. LONDON: She gave you that.

BY MS. KATZ:

Q Okay?

A I don't know what to tell you, you know what.

Q You mentioned a second time you spoke

to him and you can't recall if it was on the phone or in person, where you reiterated the statistics, right, is that fair?

A Yes.

Q This second conversation, do you know how long that one was?

A No.

Q Was it more or less than an hour?

A I did not spend an hour with Dr. Einhorn on the phone, no, so it was less than an hour. That would be correct.

Q Other than these two conversations, that you had with Dr. Einhorn, about your daughter having top surgery, did you ever speak to him about her top surgery, at any other time?

A I believe that to be so, but I can't say with one hundred percent certainty. I can tell you with one hundred percent certainty that I was against this surgery and that he had to communicate to me I believe more than two times how necessary and life preserving this surgery would be for my son.

Q But you don't have any specific recollection, other than these two times, is that correct?

(Whereupon, a recess was taken.)

(Whereupon the requested portion was read back by the reporter.)

BY MS. KATZ:

Q I will ask it. We got cut off, looks like we were missing two subsequent questions. So, other than these two conversations, with Dr. Einhorn, where you discussed your daughter having top surgery, you don't recall any other specific conversations with Dr. Einhorn, about that, is that correct?

A I don't remember specifically, no.

Q Okay. And, how many times did you talk to your daughter about her expressing that she wanted to have top surgery?

A I don't know how many times. I just know, like I said to me it was a process. It wasn't, like, you know, I spoke to him twice, and I spoke to her twice. Like I don't know. I can't say. Just know that I was not onboard, at some point he told her to write a letter to me. Told my son to write a letter to me, expressing, you know, all the reasons why, you know, but that was upon his guidance, you know, saying all right, like, we need to get mom onboard, because she is not

agreeing and, you know, we want to get her to agree right away, write all the reasons why you you know feel you need to do this and so, you know.

Q Okay. We will get to her in a second. You spoke to your daughter more than two times where are expressed to you that she wanted this surgery, right?

A I believe so.

Q Okay. And at some point, she wrote you a letter saying that she wanted the top surgery?

A She wrote me a letter.

Q Do you have that letter?

A No.

Q What happened to that letter?

A I have no idea.

Q When did you receive this letter?

A Some time before the surgery, in the months leading up to her having surgery.

Q Do you know how many months before the surgery?

A No idea. No idea how long it was, when I finally acquiesced. And we, I don't know if it was a month. I don't know if it was three months. It is just on top of it being years ago. I feel like it all, whether it turned out in a good way or

a bad way, which I categorize is clearly a very bad outcome. Even if it had gone quote, unquote, "well," and everything was how it was very traumatic for a parent. And you know I just, you're sort of on autopilot, trying to navigate just one day at a time. Trying to get through it one day at a time. This is a very traumatic process for a parents.

Q Do you remember what the letter said?

A The basic gist of it was, she needed this surgery to feel happy and whole.

Q Did the letter say that she felt like she was a boy?

A I don't know. I don't believe that was the wording. I think it was just more convincing the specific issue consenting to surgery, which she later told me was his idea, which is fine. But it was his idea. If it had been for her to have horseback riding, obviously this is a much more serious, he was guiding her to get what he felt at the time she felt was something that she needed.

Q When you say this was his idea, are you referring to the idea to write the letter?

A Yes. Also his idea to have top surgery. My daughter didn't come up with that.

Q Your daughter didn't come up with the idea to have top surgery?

A I don't believe so. That is my belief. How can I know that. He's no. I am saying yes, you know. She tells me now, he kind of guided her. She said the words to me "I wish he had just let me be a masculine boy." Her first session with him she had combat boots on and shorts and a tank top. I vividly remember him saying, you don't want to be sexy, you don't want to be cute, you want to be tough. That is the persona you want to convey. I can see by the clothes that you are wearing. You want that vibe. To like kind of like I'm tough I am strong. That I remember.

Again, you have these little moments that for whatever reason, they stand out more so than other moments. And I recollect him saying that. Like, you don't want to be sexy. A lot of girls at your age they want to be cute and sexy and pretty. He goes I don't see that with you. He is looking at the combat boots. He's looking at not short shorts, but jeans shorts, a tank top, not masculine, you know, not a boys tank top, a girls red tank top. And he said you want to convey that you are tough.

So she conveyed to me, within the last year that I wish he had just let me be a masculine girl, and not tell me, that you know, this is who you are, don't you see this is who you are. This is why you want to dress like this. This is why, you know, that is her opinion.

Q Right. This is all things she told you subsequently?

A Yes, subsequently, yes I would say recently, less than a year.

Q Did your daughter tell you that it was her idea to get top surgery and she asked Dr. Einhorn, for recommendations for surgeons?

A She never told me that.

Q Did you know?

A I don't know, no, I don't know. If that is something she said, I am not aware of it.

Q Did your daughter tell you that she had researched surgeons on her own?

A Yes.

Q Did she tell you she researched surgeons on her own, before even speaking to Dr. Einhorn about whether he had any recommendations for surgeons?

A She was well into to her therapeutic

treatment by Dr. Einhorn. Whether she looked into it on her own, the way she looked into medications, you know, she diagnosed herself with autism, before she was diagnosed with autism. Like, she wanted to understand, like why am I like this. She said it to Christy, you know, so I am just saying. She, you know, there is gaps in certain things, as far as development and maturity and this and that. It is news to me. But if she did, in fact, like, research it, I am just telling you what she told me recently which is, I wish he let me be a masculine girl. That is all I wanted to be.

Q Did she tell you that it was her idea and which to have top surgery and that Dr. Einhorn was supportive of that decision?

A No, she didn't tell me that.

Q Did she tell you that it was Dr. Einhorn's decision to have top surgery in the first place?

A His decision. It was his recommendation, was my understanding. I wasn't in the room. That I said that before, like, they had their session and she was opening up to him and discussing things she wasn't comfortable discussing with me. She was 16 years old, you know, like,

whether she -- you seem certain of what you are saying, so if that is what she testified to, she and I didn't discuss what she testified to. My feeling is directed to not do that. That is not something I should be doing and we haven't done. If that is what she testified to, that is news to me. I am still sticking to a grown man with PhD after his name would he have made that decision for his 15, 16 year old daughter. I have no way of knowing.

But he was the one that had to convince me, like, it wasn't my daughter, like, was she expressing what she felt she needed, that wasn't weighing into. If it was an expert saying your daughter is at such a high risk. Your son is at such a high risk of killing themselves. I want you to understand these statistics.

Q Okay. Other than the two conversations that you told me about with Dr. Einhorn, where he discussed these statistics, was there anything else, that Dr. Einhorn did specifically to convince you?

A I feel that we have had more than two conversations. Can I.

Q You don't remember?

A I can sit here and lie. I am not going lie. I do not know. I feel I have conveyed. That I am not one hundred percent certain. My gut extinct is like no, we didn't have two conversations that I made this life altering decision for my daughter. They had to convince me. My daughter very much felt this is what she needed. I am not saying he twisted her arm, but he took a vulnerable 16-year-old. He was very well aware of suicidal ideation, eating disorders, being on the spectrum, having learning disabilities.

He had all this information available to him. I expressed that to him. And he still pushed forward and said I have cis trans patient. Can't give me specifics but, you know, but very specific information, but he talked about other trans patients that he had and that this is what works for them and this is what they needed to do. And there is this group you can try out. There is a pride center, you know, like, he -- he like I was trying to embrace what I felt like he was trying to convince me what my child needed. I didn't come and they had slit their wrist or hung them self, you know, like that is where I'm at. I was not onboard for this. I needed to be convinced by a

man with a PhD. Not by my 16-year-old daughter that had trauma, and emotional problems.

Q Just...other than those two conversations you had with Dr. Einhorn, and potentially other ones that you cannot remember, is there anything else that you believe Dr. Einhorn did to convince you to the allow your daughter to have the surgery?

A I can't recollect anything specific, other than we are done doing conversations with him, with him trying to convince me with statistics and other patients he had, and my daughter specifically.

Q Did Dr. Einhorn convince you or at the time of the surgery, were you still unconvinced?

A I was, I feel that you know I had to take into account, what a professional who had a doctorate in psychology, I feel like, I had to acquiesce. As soon as my daughter was wheeled into the OR, I went into a bathroom and I cried. So, if that says, like, if it is all turned out well, I still would have cried. It's traumatic thing for any parent to go through. But, you know, you know, I emptied there drains of blood every morning, when they were drains coming from her chest, but I put

on a brave front for my child, but again I can't say that was because I didn't agree, it's just I don't know where it is all enmeshed in there, all the different emotions. I didn't embrace this. This was something again that, you know, someone I keep going back. He is an expert in psychology, in child psychology.

He has a PhD after his name. I had to take that into account. And if he just said she's going to be unhappy for a couple more years maybe and we'll see where this all susses out, like, no, you don't understand the risk of suicide. I had to weigh this is somebody that talked about suicide. I had to hope and pray, this was the missing piece my child needed to build a foundation, and have some semblance of a life when I feel, like, the education, you know, was a failure, you know, like, yes, I was grasping maybe.

Q Did you talk to your daughter in the months leading up to the surgery about your concerns and reservations about her having this surgery?

A Yes.

Q What did she say in response?

A I mean, she just kind of I feel, like,

those Dr. Einhorn and my daughter were saying some of the same similar things. She kept expressing how miserable she was. And this was going to fix things. So, whether she convinced him or he convinced her, but I don't see how a 16-year-old can convince a doctor, so, you know.

Q I am just asking just the conversation with you and your daughter. When you were not with Dr. Einhorn, aside from those one or two visits that you talked about, just when you and your daughter alone, had these conversations where you told her you were concerned and you had hesitation and reservations about the surgery, what did she tell you in response?

A She would say, you know, I need to do this. This is, you know, this is what I need.

Q What did say why?

A I don't remember verbatim but I mean clearly she is thinking I am a boy. I am a male, I'm male.

Q Did she tell you how long she had been anything about having top surgery?

A No.

Q Did you help her do any research on surgeons?

A No.

Q Did she ask you to look at any surgeons that she had researched; look at their bios?

A I don't believe so. I believe Dr. Einhorn recommended Dr. Chin. I looked him up. He had good ratings. Not for top surgery. But as a surgeon in general. And so, at the time, I very much trusted Dr. Einhorn's advise, and opinions. Doesn't mean I never pushed back. And maybe disagreed but ultimately, I, you know, he was her therapist, and it wasn't contentious. It wasn't I trusted him.

That is who he recommended and I looked him up. And I remember discussing it with Fox. He has good ratings. I read some of them. A lot of like, he is a good doctor. He listens. He did a great job on my wrist. It wasn't top surgery but that is all I can say.

Q Before you were told about the recommendation of Dr. Chin, were you aware that your daughter had researched other surgeons?

A No. I don't believe so. I can't say with one hundred percent certainty.

Q Okay. If I told you, your daughter had previously contacted other surgeons, but no one had

less than a three year waitlist, do you have any recollection or knowledge about that?

A I do now, well, no, you know what I can't I don't know for sure, because I thought my memory was jogged but I am now remembering that we had this experience with her having revision surgery for sagging skin, other issues, so I don't I don't remember.

Q Okay. Prior to your daughter undergoing surgery, did you other than looking at Dr. Chin and seeing if he had good rating, did you do any research about top surgery; how it is performed, risks, benefits, different techniques, things like that?

A No, but my daughter told me some of it. I didn't really research it.

Q Your daughter did the research?

A Yes. She told me different keyhole, different types. I was in the office, later, with Dr. Chin, and her expressing the type of surgery she wanted. And again, it was something, like, keyhole, and lollipop and different type.

Q Okay. Now, just going back. Before your daughter had the surgery, Dr. Einhorn referred her to other, other, I guess providers, like, the

Albany pride center, the gay center, right? The Loft?

A Okay. We went there a few, couple few times.

Q So, where did you go for you know for other consultations or references prior to?

A Regarding the top surgery, it was just for my child to have, you know, like, support and, like, more information. I don't think it was specific to top surgery.

Q Okay, Dr. Einhorn referred you to other providers for your daughter's gender issues, right?

A Well, it wasn't for a second opinion. It was just to have support as a trans person.

Q Okay. Where did he refer?

A The Pride Center in Albany.

Q Where else?

A I don't remember if he is the one who told us about the TransParentcy. I feel like we were done with him at that point. But I don't know. We went to TransParentcy. It was a pride center in White Plains, where they had meetings for parents and trans kids under 18.

Q Was that before or after the surgery?

A I think before.

Q How many times did you go to the TransParentcy?

A I don't know. Maybe maybe five times, maybe, give or take.

Q Was that something you went to, your daughter went to, you went together?

A We went to together. And I think there were times I sat in the car. I didn't want to take part. I just, you know, she wanted to go and she I stayed car and waited.

Q Was that, like, support group kind of thing?

A Yes. That is what it was. A support group.

Q Going back to the letter. When your daughter gave you this letter, saying that she wanted to have the top surgery, what happened to the letter?

A No idea.

Q Did you keep it for a period of time?

A Possible. I certainly didn't like rip it up and throw it away. It wasn't like that. I just I don't know I read the letter. I certainly didn't hold on to it, like evidence or a souvenir. I don't know, you know.

Q Did you throw it away?

A I don't recollect throwing it away, but I don't have it, I mean.

Q How do you know you don't have it?

A It is, like, five years ago, so I haven't seen it, I haven't really thought much about it in five years, so this is kind of bringing up a lot of stuff that I haven't thought about and haven't really wanted to think about.

Q Would it be possible, since you don't recall throwing it out, that it still might be somewhere in your?

A Possible.

Q Okay. Could you think of any places it might be?

A I don't know where.

MS. LONDON: Just ask her to do a search. And we will produce it if she has it.

(Request.)

BY MS. KATZ:

Q Okay, so okay. I just like to ask that you take a search and see if you can find it. If you can find it, please provide it to your attorney and do not discard it at this point, okay?

A Okay.

Q Okay. Other than TransParentcy and the Pride Center, did Dr. Einhorn refer you to anyone else?

A I don't think so.

Q Okay, how many times did you go to the Pride Center?

A In Albany?

Q Yes.

A I believe twice, possibly three times. I mean, it is a two-hour drive. We were looking for something closer.

Q Okay. Do you recall what happened at the first meeting?

A Where?

Q At the Pride Center; do you recall what happened at that first meeting at the Pride Center?

A No, I mean, it was just discussing, like, where she was at, which truthfully I don't remember where she was at, like, was it I think it was before surgery, I believe it was, yes, I mean I just think was for guidance. I don't think it was for I don't know. I think we interviewed, like, together. And then she spent most of the session with, again, I don't want to say therapist. I

don't think she was a therapist. She was a gay woman. And it was just to discuss, I guess, feelings and stuff, like, at a place where, you know, I would say all of the staff are trans, gay, lesbian, a community of people, like herself, in some way, in one way or another.

Q So, at that first meeting, was there a period of time, that you were in a meeting with, like, therapist, and your daughter, or your son at that point?

A I don't think it was a therapist.

Q Some kind of?

A Counselor.

Q Counselor?

A She didn't have I don't think credentials after her name. I think it was just an intake of questions. I think that was really, you know.

Q Do you remember filling out forms at the Pride Center?

A I think probably. Just, like, an intake form of, like, basic information.

Q I am going pull up the Pride Center records. I am going to show you some pages and ask you some questions. Julia, do you want me to

e-mail to first or you want me to just pull it up?

MS. LONDON: You can pull it up.

BY MS. KATZ:

Q I am showing you 20-page chart that we received from the Pride Center. Are you able to see what I am looking at?

A Yes.

Q This page it seems to be dated July 10th, 2019 and it is a printed form with handwriting on it. Is this your handwriting?

A I guess so, yes, I feel, like, she added that, like, that is not. But yes, that is my handwriting.

Q What do you mean she added that? Who added what?

A Maybe the woman that we were talking to, who added Rowan's e-mail address.

Q Okay. But the rest of this emergency and contact the name?

A Okay.

Q Patients. Students.

A I don't remember that. But, like, said it was, like, an intake. If you're telling me it is 20 pages? Is that what you just said?

Q I'm just saying this one page, is it

your handwriting?

A Yes.

Q That is all I wanted to know. When it says under demographics and says "gender identity trans male." Did you write that?

A Yes.

(Marked for identification, Defendant's Exhibit A, Document, dated June 19, 2024.)

BY MS. KATZ:

Q And then on page 2, actually, I am gsorry. I never marked this. Mark this as Defendant's Exhibit A for identification, which is a 20-page chart from the Pride Center. Now, looking at page 2 of what was marked as Defendant's A, where there is a checklist of presenting reasons. Are those your checkmarks on this form?

A Probably. I mean, unless she was, like, asking me. But I mean, I am not saying that is definitely my handwriting. I truly don't recollect. But if I filled out that first page, or she was asking me I'm, like, she was asking me I'm like, yes, like, yep.

Q And then on page 6 of this form, it is receipt of the Pride Center support counsel

services. Is this your signature, under signature parent guardian?

A Yes.

Q Okay?

A I remember her. Show she was. I didn't remember that. She is a licensed mental health worker maybe that is what that is.

Q Did you write your name on this? Did you write the word Claire Deacon under I?

A Yes?

Q Yes?

A Yes.

Q And wrote your child's name, Rowan Basile, at that time?

A Mm hmm.

Q Yes?

A Yes.

Q Okay. Then on page 10, again is that your signature --

A Yes, it is.

Q On page 12, again, that is your signature?

A Yes.

Q Is it fair to say you would have read these forms before signing them?

A Yes, yes. Like perused maybe. I don't know that I went over them with a fine tooth comb, but.

Q On page 13, that is your signature?

A Yes.

Q I am going to show you...

MS. LONDON: Off the record.

(Whereupon, a discussion was held off the record.)

A I skimmed over. And and and, you know, it is not like a it is a legal document, in that, you know, it is an intake form. But, like, I wasn't signing my life over to a 30-year mortgage. I didn't have a lawyer going over it with a fine tooth comb with me. I was glancing and we just wanted her to see someone, who was like herself, in that community.

Q So, you skimmed it?

A I skimmed it.

Q Okay. During this first visit on July 10th, 2019, do you recall your daughter saying that it says here that they had always remembered thinking of themselves as male and female. Do you recall?

A I don't know that I was in the room

when she said that. I don't recollect her saying that.

Q Okay. Did Rowan ever tell you that?

A No.

Q Does that surprise you, that that is written there?

A Yes, yes.

Q If you had been in the room when Rowan had said that, would you have said something to the counselor or a therapist?

A Probably not. I wasn't there to argue and, like, nail my child down to, like, you're not giving accurate, if that was her feeling in that moment, like, that was her feeling. I mean it's not certainly not accurate, as I stated under oath prior, you know, she had a normal you know one, two, three, four, five, six, seven, you know, no school prior to, like, you know, maybe the second or even not even the second time at Longview, possibly just the third, you know, has any documentation of her wanting to be called something, other than Bella Basile. And, you know, that she is gender non con -- all her preschool, like, no one is going to say this person acted like a boy, discussed wanting to be a boy, you know, not

going to be, dressed masculine, played with boys, more than girls. She played with girls. Did she play with Barbie's no. I don't buy Barbie's. She didn't play with other girls that was one of the bones of contention at her father's, there was two girls that just got into Hannah Montana. And she told her dad I don't want to go there anymore. I am not like, a girly girl. I don't I'm not whatever. But, that -- that I don't recollect her saying that. And it is quite possible once we did the intake that they had their time together. I don't even remember the woman's name.

Q Do you remember whether you spoke to anyone at the Pride Center, about top surgery?

A I don't recollect. I mean if it was, like, months before, it is possible that I brought it up. But I don't even remember I can sort of vaguely remember what she looks like, which was a very butch woman, like, completely one hundred percent dressed like a man. Had a male haircut. I do not even remember her name.

Q Okay. By the time she went to the Albany pride center, your daughter already had expressed to you that she wanted the top surgery?

A I believe so. Probably based on that

it was July. Of that same year.

Q Right. You don't remember whether or not you brought up your concerns with the Pride Center at that time about her desire to have top surgery?

A It is possible that I did.

Q Just don't remember?

A Don't remember. Like I said, I didn't even know that she had, you know, a licensed mental health worker or something I didn't.

Q Okay.

A It was just too far to go on a regular basis. If we went three times, which I believe it was probably two times, so I don't remember.

Q Do you remember if anyone at the Pride Center spoke to you about?

A Other than that woman doing, like, all the intake forms, like, I believe I was sitting waiting, like, one time I walked around the area and another time I sat for both. Like I just kind of broke it up. I think she gave her, like, a solid hour or maybe even a little longer based on how long we drove to get there. So, I believe it was twice, maybe it was three times. And then I just sat and waited.

So, I didn't maybe she spoke to me, separately, like about my concerns. I don't remember.

Q So, you only spoke to, that you recall, you only spoke to therapists, or counselor at the Pride Center, that one time. The other times as far as you recall you were outside the room or walking around or?

A That is all I remember.

Q You don't remember ever expressing your concerns to anyone at the Pride Center about?

A It could have been that woman, maybe I did speak to her with Fox or separate of Fox. I truly I wish I remember but I simply don't.

Q Okay. Did you speak to anyone at TransParentcy, about your concerns about your daughter having top surgery?

A I don't know.

Q You don't remember?

A No. Kind of, like, an AA meeting; you go around the room and say your pronouns. I am not one to -- that is hard for me to speak in a big room full of people. I know I spoke a couple of times. But I don't know if it was specific to, you know, being, you know, being having concerns about,

you know, what was seemed, like, it was imminent to happen.

Q So, other than Dr. Einhorn, and your daughter, do you recall expressing your concerns about her having top surgery with anyone else?

A Like, my family and friends, yes.

Q So, who did you speak to?

A My husband. And my close, you know, friends.

Q Did you speak to any other, professionals, like, medical professionals, therapists, counselors, that you recall?

A I don't think so, but I don't recall.

Q When you say you spoke to your husband, that is Mr. Deacon?

A Yes.

Q Forgive me. I forget his first name?

A Tom.

Q So, how many conversation did you have with Tom Deacon about your concerns about your daughter having top surgery?

A I don't know for sure. I just know that maybe if I, you know, was speaking with my daughter, and he was home, or later in the day, when he came home from work, you know, I would

break down to him you know and saying, you know, like, I don't agree with this. I am so sick over this. But I am afraid if I come home and she slit her wrist or something, like, you know, this is a nightmare, this is awful, like, sometimes it did wasn't just like I don't think Dr. Einhorn is right, or Dr. Einhorn, I know he has got to be right, right, so I should agree with him. Wasn't necessarily that. It was just how gut wrenching this whole thing was. The whole process and that is all.

Q Fair to say, you had numerous conversations with Tom?

A Yes.

Q About your concerns and these feelings?

A Yes.

Q What did Tom say?

A He felt the same as I did. And I would convey the conversations that I had with Dr. Einhorn and/or my daughter, you know.

Q So when you say Tom felt the same way you did, does that mean that he was concerned about the surgery and had reservations, but ultimately decided that she should have the surgery for her own mental health or something else? I don't want

to put words in your mouth so explain what you mean Tom felt the same way you did?

A He had reservations. And he was afraid as I was to against what we -- we someone that we respected felt knew my daughter well. And, you know, who had credentials and experience. So, you know, it was, like I said, gut wrenching but ultimately felt, you know, that this person knew what they were advising was, you know, was very very important to them, you know, being safe and okay in life.

Q Was there discussions about ever speaking to anyone about a second opinion?

A I don't believe so. I wish in hindsight that yes that had happened.

Q All right. Can we take five minutes?

(Whereupon, a recess was taken at 2:25 p.m.; whereupon, the deposition resumed.)

BY MS. KATZ:

Q When you and Tom discussed the top surgery, did you discuss your concerns that your daughter might commit suicide if she could not have the surgery?

A Yes.

Q Did your daughter tell Tom that, as well?

A No. They didn't, they didn't don't have that type of relationship. She barely confided in me, at that point.

Q When your daughter told you that she was going to kill herself, if she could not have this surgery, you believed her, right?

A I believed her, right, you know. I would leave for work, prior to all the gender thing and be nervous. Be afraid.

Q Okay. Had your daughter ever spoken to you, about potentially taking hormones to transition?

A She told me. She did discuss that she didn't want to take hormones, due to the some of the side effects.

Q What did she tell you about that?

A I truly don't remember. Like, verbatim. It is just, you know, she didn't want to take them.

Q Did your daughter tell you whether she had discussed taking hormones with Dr. Einhorn?

A Yes. That is how I think, yes, you know, like, I am not saying. I don't know. She

didn't want to deal with the side effects which, you know, you end up with a large clitoris, you know, like, and, you know, I mean that wasn't the only reason, I mean there are -- there are negative, side effects, you know, and I am sure she told me some of them, like that particular one. I don't remember all of it.

Q Did your daughter tell you whether Dr. Einhorn had recommended hormones?

A I don't recollect. I don't know if it is something she researched and discussed with him or it is something that he broached with her.

Q Do you remember if your daughter told you what, if anything, Dr. Einhorn told you what he said in terms of hormones; whether she should take them, whether she shouldn't, whether he had any opinions?

A I feel like his opinion was that she should take hormones because this is what your transitioning towards. I won't say that with a hundred percent certainty. Maybe it was suggested. I am not going to say he was pushing it.

Q Your daughter decided she did not want to take hormones?

A I think she was afraid of some of the

side effects.

Q She made that determination on her own that she did not want to take them?

A I don't know. Maybe it was with Dr. Einhorn, I can't say for sure. I don't know feel, like, by that stage she had been seeing him for quite some time. I discussed with him. I wasn't there sitting in sessions.

Q Do you know if your daughter discussed taking hormones with anyone else?

A I don't know.

Q Your daughter had researched hormones?

A She probably did, yes, she researched a lot of stuff. Like I said, she diagnosed herself with autism. I said you're not autistic. She over thinks and over researches and she is one of those people, yes, I have that and I have that, you know, I do remember Christy saying you don't have, you know, BPD, something personality disorder, no, you're not autistic, you know, so some things maybe she was accurate with. Other things she was not. She was 14, 15, 16 at the time. She is growing up in the world of having Internet. So she looks stuff up. I don't know. Again, if Einhorn brought up hormones or she schooled herself on the whole

issue. And he brought it up and she says, no, I have already researched that I don't know.

Q She diagnosed herself with autism and then that turned out to be correct; is that what you are saying?

A She's like, 11, 12, saying I am autistic, I am autistic, I have all the symptoms of autism.

Q It turned out that she did test positive for autism?

A Years later, yes, not years and years, but that is when we ended up, you know, at Carmel Psychological before meeting Einhorn. And she is on the spectrum.

Q Did your daughter also diagnose herself, as with body dysmorphia or body dysphoria or gender dysphoria?

A I have no idea. I know she talked about gender, like, fluid, like, with Christy, like, like, I heard about it one time. So, she had a lot of time on her hands at home, not in school, so I don't recollect.

Q Did your daughter tell you that she was trans?

A Again, that was a process. She was

probably, at that point, 15. And I, again, I am just saying the timeframe. I am not blaming Dr. Einhorn, but you know, the very first session with him, she was not saying I am trans. She was a girl, you know, who had Doc Martens on. And, like, not long long shorts, just, like, feminine shorts, jeans shorts and a tank top.

Like, she was still identifying as female, for sure, at that point. Whether, you know, she had researched like body dysmorphia I just I don't recollect.

Q Okay. But at some point around the age of 15, she told you that she was trans?

A Yes. Probably, yes.

Q What, if anything, did you say in response?

A I don't remember. I just know that I always try to be supportive. I didn't say it, like, that is ridiculous you're not trans. I don't think that is the case. I would just kind of, like, try to take it in. And try to be supportive. Like I said, she had a lot of mental health issues, at that point. I always was kind of, like, ^ get gloves. I didn't want to even if in my mind, I'm just like, oh, my gosh outwardly I always try to be

supportive.

Q So, when she told you she wanted to cut her hair shorter?

A Yes.

Q You were supportive?

A Yes. When she said, like, one of the haircuts, no, no, I don't want it like that. There was a woman who had like longer in the front one of the hairdressers longer in the front, buzzed in the back, very feminine, that was her thing. She was, like, you kind of -- she was, like, no I want, like, like, I don't want it all buzzed. But like I don't know.

That is not what I want, she knew what she wanted. She wanted a boys cut. A very short boys cut. Like what age that was, I don't remember I just remember going to the hairdresser, like, more than once, there. That specific place like, you know, she maintained having a shorter haircut.

Q Was this before or after she was 15?

A It is possible she was 14. I can't say, for sure. I just don't. I don't the pattern I see is that all of these issues bled one into the other into the other. This therapist into this therapist and this school and this school and this

problem. They literally just one thing after another.

Q When she changed her name, and her pronouns each time?

A Yes.

Q Did you go to the initial consultation, with your daughter with Dr. Chin?

A Yes. He would have seen her without me.

Q Do you recall when that was?

A No.

Q If I told you, the records reflect, I think it was October maybe September. One second. Let me just check.

(Pause.)

BY MS. KATZ:

Q If I told you the initial visit with Dr. Chin is on October 15, 2019?

A Yes, I agree. I am not recollecting. If you say so.

Q So, was it just you and your child and Dr. Chin in the room during that initial consult?

A No. I take that back. It could have been at one point maybe when he was examining her, but it could have been that there was a nurse in

the room, also. I am not positive, but I mean at some point, one of his nurses was in the room.

Q Okay. Was there any conversation with the nurse?

A I don't think much.

Q Okay. Do you remember Dr. Chin taking a history from your daughter?

A No, I don't know. That could have been a half hour. It could have been an hour and a half. I just don't remember. I am sure he took information. How in depth of a history it was, I don't know.

Q Do you remember any conversations with Dr. Chin, at that initial visit?

A Just you know, I mean, I signed a consent form. I know that. I don't know if it was that first visit. I don't even know how many times we saw him. It might have been once. I don't know for sure.

I know that my daughter did specifically say about a specific type of procedure, that she wanted because she had researched it. I myself did not. I was physically ill, like, really getting into the nuts and bolts of it. It just it was very difficult.

Q You don't recall any other than some vague recollection of your daughter discussing specific surgery techniques, you don't recall anything Dr. Chin said to you and your daughter or you guys said to him?

A I mean, I do remember him asking if, you know, if she felt sure of this. And she said yes. And I obviously he had Dr. Einhorn's referral or recommendation or whatever you want to call it his report, that Dr. Einhorn had written.

Q How do you know he had that?

A Because we wouldn't have been -- we wouldn't have had an appointment.

Q How do you know that?

A Because that was the process. Dr. Einhorn's psychological report, recommendation, what have you, it is just, like, if you want to go see a doctor about your back, you need to go to your primary care doctor first. And get a referral. You just don't go like, oh, I need a brain scan, like, your doctor has to go through the process. That is the process.

Q I guess what I'm asking is, are you assuming that is the process because that is the process for other things?

A No. I know that Dr. Einhorn wrote a report.

Q Let me finish my question. I'm just asking, did someone tell you that this is required and this is the process?

A Well, I believe Dr. Einhorn said that, you know, he had to write, like, a mental health recommendation that, you know, these boxes were checked. In order to get to the next point which was discussing it with a surgeon. So no, did he show me the letter, I don't believe so.

Q Okay. Now, other than what we already discussed, do you remember anything that was discussed with Dr. Chin at that initial visit?

A Well, I believe he gave her a physical examination of her breasts. Possibly even, like, her general health. I am maybe extrapolating. I am sure like she had to pass, like, being physically fit. But I know that he looked at her breasts. And took photographs of her breasts.

Q You mentioned that Dr. Chin asked her if she was sure that she wanted this surgery. Do you remember if there were any other questions that he asked? Specifically about her desire to have the surgery?

A No, I don't recollect.

Q Did you express to Dr. Chin any of your reservation about this?

A No. No. I did not at that time. I felt like we were past that. Unfortunately. I mean, maybe that is a copout, but I mean we were there, with a surgeon. I voiced those concerns to Dr. Einhorn.

Q Do you recall your daughter, at that first visit with Dr. Chin, telling him that she wanted to undergo gender assignment -- gender reassignment in order to align himself sexually and he started about this for three to four years?

A No. I don't -- I don't remember them saying that.

Q Okay?

A You know, if they needed to say that, you know, I don't that I would have stood there and objected. I mean, it doesn't bear out, like, medical records won't that won't bear out. Like if that is what she said, to ensure that he would, you know, be onboard, and do it, like but I don't remember her saying that, that like three to four years, because I mean it just, you know, but, you know, in her mind she is counting, like, when she

said something to Christy Gotto. I don't know. I am sorry. I don't know.

Q You don't remember your child saying that, at that visit?

A No.

Q And if they had said, you wouldn't have stepped in and corrected them?

A I don't know.

Q Did you ever ask your child if they had been feeling that way for three to four years and just kept, like, kept it from you?

MS. LONDON: I am going object. This question presumes that she was in the room with Dr. Chin, when he made this note about three to four years.

BY MS. KATZ:

Q She said she was present for the initial consult?

MS. LONDON: Can you rephrase the question.

BY MS. KATZ:

Q Okay. Did you ever ask your daughter if there was a period of years, where she was feeling like she want to be male before she came out to you? She was like --

A Didn't ask her that.

Q But she was too scared to tell you, you never asked her?

A No, I didn't. I don't believe so.

Q As you sit here today, you don't know how long she had been feeling that way prior to her surgery, correct?

A I feel like it was possibly 14, you know, the end of being 14 into 15. That is my recollection. And my opinion, but, you know, there are certain things I can say, I recollect one hundred percent. And there is things I am going to tell you I am not sure. I am not sure. I don't remember him saying that, you know, Fox saying that to Dr. Chin.

Q You don't remember asking your daughter for how long she had been feeling this way, prior to coming out to you?

A No. I mean, again as I said, I was just dealing with, you know, it was literally just one thing after another, you know, being out of this school, trying to find another school, getting calls at work to come pick her up at school. Having to leave my job. I am still at that one job 11 years. By the grace of God, I didn't lose jobs,

because I had someone that was very understanding -- they weren't privy to everything. They knew school was calling and I had to leave work early. It was just trying to get through each day sometimes. I mean, I sat with Kate. I sat with Christy. I sat many conversations, so I feel, like, I was involved but, you know, did I ask that specific, like, how long have you been feeling, I don't -- I don't recollect asking, like, I don't think I didn't feel, like, it was relevant.

Q Okay. Then after this first visit, do you have recollections of any other preoperative visits with Dr. Chin?

A I don't know, if it was one or two times that we met with him prior to the surgery. I just don't remember.

Q Do you remember him talking to you guys about any his concerns about the surgery or what to expect?

A I don't know. I mean remember him saying that she would have drains in, more of, like, just, like, the actual, you know, process, but again, I know that my daughter said that he didn't do the procedure that she felt was best for her size breasts, you know, so, but, you know,

just.

Q At the time your daughter underwent surgery, you understood it was a permanent physical change, correct?

A Yes.

Q Did your daughter understand that?

A I am not sure.

MS. LONDON: Objection as to what her daughter understood.

BY MS. KATZ:

Q You believe that your daughter understood that?

A I don't feel that it mattered.

Q Why?

A Because if they were going to kill them self, you know, like, I really just tried to be like blinders and focus on, how to get through this, me, mentally, emotionally, my daughter mentally and emotionally. So, like, if we came to that, I don't even really know how to answer that, like I said, I just didn't want my child to die, by suicide, and I had to, like, you know, lots of things, like, just go by the wayside, because if I, you know, I knew that she had mental health problems. I knew that was extremely immature for

her age. Could she go on a computer to look things up, she sure could.

If we were going to be where we are right now, not a lawsuit, but just like having to get implants, like, I just couldn't even focus on that, like, like, how much do you really understand do you really really really really really really understand that this is permanent. I am sure said it to her once. I wasn't going to hammer it home. There is learning deficits. There is emotional deficits. I just felt, like, I was on a speeding train.

I was trying to make the best decisions tat I could and I don't I know you know by the time we were with Dr. Chin, you know, the person that got the questions and the doubts, and the questions and the doubts and the doubts was Dr. Einhorn. That is the doctor person that knew my daughter for years at that point. And again, has a doctorate in psychology and specifically treats children, so, that is who I felt was the person qualified to make that decision. And he didn't I was just like let's do this. This is going to make all the difference in her, his life, no. He had to convince me. By the time Dr. Chin like I said it was, like, a

speeding train. I was trying to make the best decision at that point, that I could.

Q You keep saying Dr. Einhorn convinced you. Am I correct that it was also your daughter who convinced you?

A I will reiterate. Because I said this before. I wasn't listening to a child, who was 15 and turning 16 with emotional problems. A child that, you know, like, sobbed on the bathroom floor after getting her first period, like, that is not who was convincing me. The person that was talking about suicide. Never had a successful school experience for more than months at a time. Like, never graduated, never had a successful, had friends come and go because she was at her father's for four days and here three days and then back and forth and it changed literally over three years. You want to know how many times it changed, I can't count on both hands how many fucking times it changed.

So, it was just she was not going to be the one, someone who had most of her childhood from 6, 7, 8, 9, like severe problems. I mean turning to others, yes, listening to others. I would call Kate Roell. This is happening what should I do. I

turned to the experts. They will tell you that if it comes to that. I turned to Christy and said, I don't know what to do, like now she is talking about this or now this happened at school. I turned to the experts. I have a mind of my own. I am not a stupid person. I also don't have mental health background.

And I would turn to people. And this is a person. Dr. Einhorn, who now was treating her for a couple of years. And so, of course, she is saying what she wants. And what she felt she needed, but she didn't hold water for me because this is a person, who wasn't emotionally 16. And I expressed that to him, if not these exact words, but I expressed those words to him.

So, he was the one who had to convince me. It wasn't both of them. It wasn't her. It was him. And it wasn't Dr. Chin. It was Dr. Einhorn. The onus was on him. And I hold him responsible. If I hope that clears things up.

Q When he convinced you the process of convincing you, that took place over these two sessions, that you recall?

A I don't believe it was two sessions.

Q Again, you don't recall any other

conversations where he?

A Is that all you have. You are going to repeat that 47 times?

Q I am just trying to understand?

A Are you trying to understand or you just trying to keep hammering that home.

Q No because I want to know anything else that I am missing?

A I am repeating the same thing. He has PhD in child psychology behind his name. That's who I turned to. He didn't know my daughter for a week. Didn't assess her twice. He knew her over a period of years. That is whose opinion I had to weigh and it was still a very difficult decision. It was not something I took lightly and I cried many times over it and my husband was there to, you know, you know, he wasn't my rock, either. He was sick over it, as well.

Q Okay. You mentioned that you had texted John Basile about surgery. Did you express to him that you had reservations?

A Not at all. I would never say that to a man that hadn't been in my daughter's life. It was too inform him. It wasn't to get his opinion, his input. Sad to say. He chose not to be in his

daughter's life for many years and to this day, for what it's worth. I didn't even know he objected to that. I was not aware of that.

Q How did you find out he objected to it?

A My daughter told me recently.

Q When you texted him to let him know?

A He replied I am not okay with this. I am not onboard with this. I don't want this. I was, well, you know, I am sorry but I was just kind of informing you. It was just for you to know. I feel, like, you should know.

Q Was there any further conversations or outcome?

A No. I don't believe so. Not with me.

Q Did he have to sign off on approval for this?

A I don't believe he did, no. Probably maybe he should have. But that wasn't for me to say.

Q That is in the custody agreement?

A Probably. He didn't have any contact with her for, like, four years at that point. And maybe a year or so before that it was spotty so.

Q So, when you learned recently that Fox told you that he objected to it, what did she tell

you?

A I don't think I was aware that him and Dr. Einhorn had spoken. He and Dr. Einhorn had spoken.

Q Okay. Your daughter told you that they had?

A Yes.

Q Did she tell you what she learned about that conversation?

A She wasn't there. And I don't know. I don't know the details. I mean unless am blocking something out, I mean never spoke with John Basile. It was the text.

Q Forgive me. I really I am not trying to do this on purpose. I just don't remember if I asked you, do you still have that text message that you sent to John informing?

A No, like I said, two phones at least ago. Are they retrievable somehow, I don't know. Dose have them, maybe he does.

Q Did you ever ask Dr. Einhorn to meet with either John or Tom to discuss the top surgery before she underwent it?

A No. My husband didn't go to therapy sessions with us like, you know, he just wasn't

part of that, you know, decisionmaking, like, he loves her, he is her step dad but, you know, he wasn't part of that.

Q Did you ever talk to an endocrinologist, about your daughter's desire to have top surgery to see whether there were any other underlying medical concerns?

A Yes.

Q Who did you talk to?

A I don't remember their name. But again this wasn't specific to top surgery. It was trying to get to the bottom of why a physically normal female does not get menses, so that was -- that was what initiated doing some testing. And her, at that time, because now there are within, the last couple of years, her hormones were quote, unquote "normal," but how in 20, you know, '17, '18 they were -- they were abnormally low.

And there was a adolescent medicine doctor that wanted to just put her on I guess estrogen, to see if it would bring on a cycle, I believe she was 15 at the time. I could be wrong though.

Q Do you remember who this is, that wanted to put her on estrogen?

A I think we saw her twice. And I could probably I don't offhand, I don't remember the woman's name. Not someone we saw I think we saw her once and then saw her for the follow-up, once per blood work came back.

Q Leave a blank in the transcript. If you remember the name later of this endocrinologist or this adult medicine doctor, adolescent medicine doctor, you can fill it in, okay?

A Okay.

(Request.)

BY MS. KATZ:

Q So this doctor wanted to put your daughter on estrogen to promote menstrual cycle?

A Mm hmm.

Q Yes?

A Yes.

Q What, if anything, was your response to that?

A I said, you know, that we weren't going to just we didn't want to Band-Aid. We wanted to know, like, why they were low, like, what was the issue. And I will be honest, I didn't want a kid sobbing on the bathroom floor screaming when she

got her period, if she got her period. To this day, she doesn't get a period. She doesn't have a period.

Q So, when told the endocrinologist that you wanted to know what the issue was, is that when the endo --

A We saw somebody else.

Q Sorry?

A I don't know. Okay. Go ahead.

Q I keep saying endocrinology but I realize you said adult adolescent medicine doctor?

A No, they are not one and the same. We tried to see an endocrinologist, and they wouldn't see us. Because Fox's vaccine status. I mean, that came to light. Send us the medical records. Like they did. I called Riverside Pediatrics. They did. They're like okay, they didn't send this they didn't send that. I will contact them again. That is how it came to light. Then they were, like, oh, yes no they didn't have vaccines. They didn't see us. That was the first attempt to see an endocrinologist.

Q Got it. Were there also various schools that would not take Fox because of her lack of vaccination?

A That was only Oasis because up until whatever year that was, I don't know if that was 2017 or 20 -- I guess it was 10th grade, I believe. Maybe 11th grade. Not positive. But she went to Oasis where there was still -- still an exemption form, a religious exemption. And then the law changed in New York State. So Fox would have had to get in a period of, like, two months, like, I don't know 15 vaccines or something like that.

Q So, before -- before she was at Oasis, was going to the schools with no problem?

A Mm hmm. Because there was still religious exemption, so that was my daughter's understanding that there was a religious reason. I was not breaking to a 10-year-old or 9-year-old. Before that like in a small private school it was even a nonissue.

I didn't want to get into the whole, like, I am lying, you know, like, but that is the only exemption that existed in New York State. Other states have philosophical, medical, religious.

Q So, other than this endocrinologist, were there ever any other doctors or providers that refused to see your daughter, because of her lack

of vaccination?

A When we were looking for a new pediatrician, I don't remember his name, but it was a man. I brought it up because we had that issue with the endocrinologist. He said I don't think that would be a problem. He was a man doing the intake thing over the phone. Making an appointment. And he called back to say, you know, he wanted clarification, and that no, that doctor would not see them. We went to Bambini. That is how we ended up at Bambini.

Q So, you never saw an endocrinologist?

A I don't believe prior to surgery, no.

Q But you did see an adolescent?

A Adolescent medicine.

Q Now, this adolescent medicine doctor, they sent her for lab work?

A Yes.

Q What was the result of that lab work?

A Are you saying about the adolescent medicine doctor? Her hormones were low.

MS. LONDON: Object to this questioning. We have gone through ad nauseam at this point. You know, you say you have a lot of ground you still

need to cover. You have been going for four and a half hours. Just if we could just please move this along. So you're not asking the same questions over and over again.

Q So after you got the labs and were told the estrogen were low and the doctor recommended estrogen, you refused the estrogen; is that correct?

MS. LONDON: Objection, objection asked and answered. Don't answer.

BY MS. KATZ:

Q It wasn't. Did you decide not to take the estrogen for your daughter?

MS. LONDON: Objection.

BY MS. KATZ:

Q Can she answer this?

MS. LONDON: No, you covered it.

BY MS. KATZ:

Q Why did you decide not to take the estrogen?

A I said I feel like that was a Band-Aid. It is not -- it is not getting to the bottom of why. Why is she not getting menses, you know, why is her body not making enough estrogen. Now, she

is in the normal range. So I don't, I mean there is still unanswered questions, with some of these anomalies with her medically, but I mean no one is saying your kid is going to kill herself if she doesn't get estrogen. The tipping point might come like she could die from this. There is serious medical ramifications, like, that wasn't the conversation, so we didn't move forward with that.

Q Okay. So did you then seek out any other healthcare professionals to get to the bottom of why her estrogen?

A The endocrinologist wouldn't see her for that particular issue. We tried to see a endocrinologist. All the stuff takes time. Might get an appointment, like, two and a half months later. Like and then they wouldn't see us, like, scrambling, you know, like, I don't know to make another appointment with somebody else, that would you see her, you know.

Q Did you ever get another appointment or follow-up in any concrete way, with any doctors to get to the bottom of why her estrogen?

A I think it was after the surgery that we saw an endocrinologist and her hormones her female hormones at that time were in the normal

range. So no, we did not have the answers. And, by then, I believe we were at Bambini and she had some, like, they found, like, an immune, immune system deficiency. And something, wonky with I believe her white blood cells were low and she has been tested and some doctor like I think it was at Bambini some people are just, like, she had we were at the ER when she was 13, 14, for like severe stomach aches. They do blood work. They were, like, she has abnormal low white cells. I don't know if it was Baskind. I just don't remember or if it was someone, you know, they said it could be very serious in the ER. They said some people it is an abnormality.

It is not critical so, like, you know, I won't say it exhausted I mean she had an endoscopy colonoscopy with the stomach issues. We went to Albany where we were recommended in Albany. I have done things to try to get to the bottom of some of the medical issues at times.

Q Just going to try to get some names. Just briefly the names of all these doctors and hospitals, that you have taken her. Just names. That you recall. What is the name of the endocrinologist that you saw --

A I don't remember. I will have to we saw her, like, twice, she was lovely but I don't remember her name.

MS. LONDON: Claire, Claire, it's fine. If you don't remember, just it is fine to say you don't remember. And make sure that you're listening to the question that Ms. Katz is asking you and just answering that question. That will move this along.

(Request.)

Q Leave a blank in the transcript for the endocrinologist that you saw after the surgery if you have any --

MS. LONDON: You have already said that. You have already established leave a blank in the transcript.

Q I don't think I did for this one?

MS. LONDON: You did.

Q No. I left it for the adolescent medicine doctor. Anyway, okay, where did she go -- what was the ER she went to at 1450 Putnam?

A Putnam County.

Q Has she ever gone to any other ERs?

A I don't think so. For stomach aches. To me that is, like, a stress thing.

Q I am just asking where she went for those?

A Putnam. Putnam Hospital Center.

Q Where did she have the endoscopy?

A In Albany.

Q What is the name of the doctor?

A I don't remember his name. I don't remember his name. Again she saw him twice, to the assessment and the procedure. And that was it, just a specialist.

Q Where was the procedure?

A Albany Medical. That is who Bambini recommended was this gentleman, pediatric GI doctor.

Q Who is her current pediatrician?

A It is not one particular person at Bambini Pediatrics in Poughkeepsie.

Q She still goes to Bambini?

A Yes.

Q Does she see anyone else for general medical care?

A No. Bambini.

Q Does she have a specific?

A She has an appointment, yes, Bambini.
Q All right. That is where she goes if she has the flu or if she has a cold?
A Yes.
Q Does she see anyone else for that?
A No.
Q Does she have any other current providers that she sees?
A I don't believe so.
Q Does have an OB/GYN?
A No.
Q Why not?
A She just doesn't.
Q Has anyone at Bambini ever recommended that she see an OB/GYN?
A Possibly. Possibly, like I said we were dealing with the GI. We were dealing with the abnormal hormones so just, you know, we haven't done that.
Q Other than that GI doctor up in Albany, has she ever seen any other GI doctors?
A I don't believe so. I think she was in the ER two maybe three times for severe stomach aches, so they, you know, they did blood work, they did an abdominal, like, you know, scan to make

sure, to make sure there wasn't anything seriously abnormal.

Q That was at Putnam?

A Mm hmm. Yes.

Q Has she ever seen any other GI that you can recall, outside of there or in Albany?

A I don't believe so.

Q Does she have a current mental healthcare provider like a therapist?

A Mental health?

Q Yes?

A That would be Melissa Marino.

Q Does she see any psychiatrists?

A No, Melissa Marino.

(Whereupon, a recess was taken at 3:21 p.m.; whereupon, the deposition resumed at 3:28 p.m.)

BY MS. KATZ:

Q Is Fox currently, is she still going by the name Fox?

A Right now, she is, yes.

Q Currently what are her pronouns or his pronoun?

A She.

Q And, is she currently living at home

with you?

A Yes.

Q Does she work?

A No, not right now.

Q When is the last time she was employed?

A Probably last summer. Wasn't a camp counselor. It was, like, a theater camp when she was an actor at the camp.

Q Does she currently have any acting, not necessarily jobs, but roles?

A It was an unpaid role, that just happened recently.

Q When was that?

A This past weekend. Monday.

Q She was in theatre production?

A It was, like, a project that they want maybe to get picked up, like, the streaming thing. It was unpaid.

Q It was just one weekend or was there rehearsals for it?

A She had the script for a while.

Q It was just a one weekend event essentially?

A Yes.

Q Does she have anything else coming up?

A No.

Q Is she searching for work?

A Yes. She does look for work.

Q What does she currently do?

A Try to survive each day.

Q Does she have any hobbies?

A Not really. She was very upset over the shoe, where she had to wear a tank top and she now realizing that she feels, like, she made a mistake, and she is not small chested. She is completely flat chested, you know, there is angst and tears and, you know, I just try to support her and saying you got this. Let's put one foot in front of the other. You know she's played a female in this role.

Q Have you two spoken about potentially getting breast implants?

A Yes, definitely spoken.

Q Can you tell me the sum and substance of those conversations?

A She told me about a couple of doctors that she was, like, looking into. Very expensive. I don't know that insurance covers it for in the very baby steps of looking into that.

Q Are you supportive of her decision to

get implants?

A Yes.

Q Has she told you she wants to get them?

A Yes. That is why we are in the baby stages of looking into it. I am not driving the train. She is 21. She is having regrets over decision she made when she was very young, and impressionable, and uh...

Q So she is currently researching potential doctors to get the surgery?

A Yes.

Q Has she had any consults with any of them?

A She spoke to somebody within their office and they said to get a referral from her doctor.

Q Who did she speak to?

A I don't know. I don't think she spoke to the actual doctor, just someone in an office where they do reconstructive surgery.

Q Do you know where she went for that consult?

A She didn't go. It was over the phone.

Q You said she spoke to someone in her office, and I assume that was in person. My

apologies. She spoke to someone on the phone?

A Mm hmm correct.

Q Do you know who?

A Someone in an office that they do reconstructive surgery.

Q Do you know the name of the office or the name of the doctor?

A No. I know it was New York. Someone in New York City.

Q Do you know if they were affiliated with the hospital?

A We are in the very baby stages. She needs a referral from her doctor.

Q Has she spoken to any doctors about getting a referral?

A We have an appointment with her -- with her pediatrician to get a referral. That is what this doctor's office said would be the initial step.

Q That is with Bambini?

A Yes.

Q Is it with someone specific at Bambini?

A I don't know. She made the appointment. I am going to bring her. I think it is the 26th.

Q June 26?
A Yes.
Q What is her current medical insurance?
A She gets Medicaid. I believe it is, I believe it is Fidelis Medicaid. I don't believe, yes.
Q Do you know what insurance she had at the time of Dr. Chin's surgery?
A I don't believe it was Fidelis. I don't recollect. It is, like, on the tip of my tongue. I don't recollect.
Q Do you recall any other medical insurances that she has had?
A It is always been like Child Health Plus and whoever in our area carries it. So it does change, based on what is available in the market.
Q Is Child Health Plus Medicaid or something else?
A Well, once she turned 21 it's not considered Child Health Plus anymore. I think it is Fidelis Medicaid, I think. I am not positive. I think it is Fidelis.
Q Is Child Health Plus sort of a division of Medicaid, if you know?

A It is subsidized because neither me or my husband get health insurance from our jobs. We are private contractors so she has always been able to get Child Health Plus.

Q So she is not covered under your insurance?

A No.

Q Got it. When you ordered a binder for Fox, initially, did you go somewhere specific to buy it?

A Online.

MS. LONDON: Objection, asked and answered.

BY MS. KATZ:

Q Did you research different kinds of binders?

A I didn't. She did. I am sure.

Q Did she tell you exactly what she wanted?

MS. LONDON: Objection, asked and answered.

MS. KATZ: It wasn't this.

MS. LONDON: You have explored this whole binder topic thoroughly.

MS. KATZ: Didn't. I didn't ask

many questions about it, to be honest. I really didn't.

MS. LONDON: It's been five hours. We are up to five hours. I am just reminding you.

MS. KATZ: Julia, you have a case, that is a serious case. I am entitled to ask my questions. If you want to drop your case, feel free. And I will stop asking questions.

MS. LONDON: No, I don't want to drop my case -- because we haven't even -- sorry?

MR. BUGLIOSI: My client was tortured for hours, by Adam. So I don't have any sympathy.

MS. LONDON: That is Adam, not me. John's saying that your client -- his client was tortured for hours by you.

[!ATTORNEY1] Not seven hours.

MR. BUGLIOSI: It was equivalent of 27 hours.

MS. LONDON: Let's keep going. Let's keep going.

BY MS. KATZ:

Q So did the binder that you bought, was it did you buy one binder or more than one binder?

A I think it was just one, I believe.

Q Did you ever buy a different binder or was it just that one time?

A I believe it was one binder.

Q And, did your daughter have issues wearing the binder?

A From what I understood from her is it's not healthy to wear a binder, in general.

Q Did your daughter tell you that she was having trouble breathing with the binder?

MS. LONDON: If you remember.

A I think she expressed you know, that it is not healthy to wear a binder, like you know, indefinitely.

BY MS. KATZ:

Q Did she tell you that is one of the reasons she wanted the surgery, so she wouldn't have to wear a binder?

A Yes.

Q Did she ever tell you she was having difficulty breathing because of the binder?

MS. LONDON: Objection, asked and

answered.

BY MS. KATZ:

Q No, she didn't answer that question. She answered --

A I don't remember if she told me that I don't recollect.

Q Did she ever tell you that she bruised her ribs, from wearing it so tight?

A No, I believe.

Q Did you ever learn that she had injured or bruised her ribs from wearing the binder too tight?

A I recollect her saying that it was very uncomfortable. And it's not health to wear. Beyond that, I don't recollect anything that dire.

Q Are you aware that your daughter, at some point, wrote a college or attempted to write a college essay, and it was about being trans?

A I don't think I know that, no. That would be news to me.

Q Okay, other than the letter, that she wrote you, have you ever read anything else that she has written about her desire to have the surgery, become trans, anything like that?

A No.

Q There there was a period after your daughter had the surgery by Dr. Chin, that she was happy that she was no longer -- that she no longer had breasts; is that correct?

A I believe that was.

MS. LONDON: Objection. Rephrase the question. Where are you getting this from. Objection.

BY MS. KATZ:

Q Okay. I will rephrase it. When was it that your daughter first expressed to you, that she regretted having the surgery?

A Probably only within maybe a year ago, or so.

Q What did she tell you at that time?

A I remember us having a disagreement. And she said I have had a really rough day. And I said okay, what else is new, you know, what else is new.

She said, no I mean, like, a really rough day.

I said okay I am not a mind reader.

And she said, I think I made mistake. I just think I knew what she meant.

But I said, like, I don't know what you

mean, what are you talking about.

And she said, you know she was talking with Melissa about having made a mistake, so I feel, like, again this was a time, you know, another example, of where she felt something, she knew something and, you know, she didn't tell me, you know, I don't feel that I found out, like, you know, like, right when it was happening. I feel like she was aware. And, you know, she didn't want to tell me right away. I can tell you after the surgery it was very short lived.

I said you know I thought all of this eating, like, issues, were going to like that was the reason, like, all of this unhappiness, all of this -- this was the missing piece, and, you know, those issues didn't go away. It was very short lived.

She wasn't saying I made a mistake. She wasn't saying, you know, I am not happy. When the healing occurred and it was sagging areas where her nipple there was skin, like, hanging over what was left of a revised nipple, you know, so that was the focus. That was the focus on why she was unhappy and, you know, look what I just hold my arms at you know relaxed, like, the skin is hanging

over, so then came the next step finding someone who could try and fix that. Not, you know, I was wrong. This was completely wrong. I am completely unhappy. But the issues were still there. The eating issues were still there. The emotional issues are to this day are still here, so unfortunately.

Q When she went to Dr. Chandler for the revision surgery, at that time, she still wanted to?

A To who?

Q Chandler? Dr. Chandler. Is the one --

A I thought you said Dr. Chin.

Q Dr. Chandler. Chandler. She did the revision surgery, right?

A Correct.

Q That was in January of 2021, does that sound, correct?

A Possibly, okay.

Q Okay. At that time, she still wanted a flat chest. She was just unhappy with the cosmetic way it turned out, true?

A I believe so.

Q Okay, and at that time, she was still seeing Dr. Einhorn?

A Yes.

Q Then, she stopped seeing Dr. Einhorn, around the end of December of 2021, is that correct?

A I am going by if that is what the records show, because I have no chronological correct, like, I have no picture of that. So, if that is what the record says, like, then I will agree with it.

Q I will represent to you the records reflect that she stopped treating with Dr. Einhorn, in December of 2021.

Am I correct that as of the last time she was treating with Dr. Einhorn, at that time she was still identifying, as a male?

A I believe so, yes.

Q At that time, she had not expressed to him or to you as far as you are aware any regrets about the surgery?

A Right. Correct.

Q Okay. Her next therapist, I believe she testified, was Kevin O' Donahue, were you involved with any of her treatment with Dr. O' Donahue, Dr. O' Donahue?

A We had expressed to Dr. Einhorn that we

didn't want to stop seeing him. As I had expressed, none of the issues, that he was convincing me were, you know, were going to dissipate, and and and, greatly improve. The surgery was going to mitigate all of the issues because that was the issue. And we were still seeing all the issues.

So, I know I expressed like no no no we don't want to totally stop seeing you, Dr. Einhorn, like, somebody recommend this person. And we would like to give it a try. And she doesn't even have an appointment at this point. We are just exploring it and he was, like, check in with me in a month. And I beyond that I don't remember if Fox was reaching out after a month or, you know, but that therapist was a short lived.

Q So how did the conversation come up, about potentially seeing someone else, other than Dr. Einhorn?

A I just, again, Fox was having, like, all the same issues, again. That I really I truly believed were going to be very diminished, you know, after having this surgery that, you know, like, was the missing link and none of that happened and somebody that we knew, their daughter

really liked this guy in the city, and again I am, like, trying to remember the name of the place, but, you know, their daughter was having, improvement with this man.

And so, we told Dr. Einhorn we were going to, like, maybe give it a try. He just kind of cut contact after that. He was just like okay I was, like, no no no no no. I would like to still, like, like, insurance pays for you, you know, she's been coming to you, she communicates with you, we are going to just try this guy, like, they don't even have an appointment. He was very abrupt with I felt like just kind of cutting her off, and saying you can check back in a month. She was trying to reach out and he did not avail himself, and we didn't seek Kevin, you know, more than a few times, so she was back at square one, finding somebody else and that is who she is with now.

Q After this conversation -- withdrawn. Was this conversation with Dr. Einhorn where there was a discussion about seeing some guy in the city or seeing someone else, was that conversation with you and Dr. Einhorn or was that a conversation between your daughter and Dr. Einhorn or a combination?

A It was a combination. Maybe I spoke to him on the phone.

Q He just said check in with me in a month?

A Yes.

Q Did you either you or Fox check in with him in a month?

A Fox tried.

Q Do you know if she tried via phone, via text, something else?

A I am not sure. I am thinking maybe text. I mean, I think we were in COVID at that point. And he said he needed a vacation or something like that, she said. I don't know firsthand.

Q You don't know how she tried to reach out to him?

A No, I don't.

Q Did you try reach out to him?

A No. I was upset that he like when I tried he said no no no no you you shouldn't see more than one therapist like it should be one therapist. That is not what I am trying to do. She is still struggling. He was like no I pled my case. He was, like, no.

Q Okay. Did you tell Dr. Einhorn that you're going to ask Fox to give another therapist a try, and that you would pause your sessions with Dr. Einhorn to allow potentially, this other intervention a chance?

A My recollection was that I wanted Fox to continue to see him, like, every other week. And try Kevin, every other week. I didn't want to pause. I believe it was him who said, you shouldn't be, like, two therapists at the same time. Like it's kind of, like, a conflict. So, we accepted that.

And then Fox told me that she tried to reach out and I think she said at one point he said he needed a vacation, too. I need a vacation too. Like, a vacation, or, like, a break from her, I don't know but he.

Q That is not something he told you, that is something he told her?

A Correct.

Q Did you, in fact, pause your sessions with Dr. Einhorn?

A I don't feel like it was on our end. We wanted to see.

Q I know what you are saying. It wasn't

your decision. I know you're saying you feel like you wanted to make that decision. All I am asking is, did you at some point pause your, did you call and stop for insurance reasons, did you ever pause it logistically?

A I think we had the conversation. And he said you shouldn't see more than -- I said we don't even have an appointment right now with this guy, like, we're I am in a communication with the yes, like, the Positive Mind Center in Manhattan. Like, we don't have -- I felt like he kind of made the break.

And then, you know, Fox tried to resume. And he was not receptive to that. That is what I recollect.

Q Now, were you present at any visits with Mr. -- or Dr. O' Donahue?

A I was there for the initial one, yes.

Q Was there any conversation at that initial visit with Dr. O' Donahue, about the top surgery?

A I don't think so.

Q Then if I told you that your daughter started treating with Melissa Marino around March of 2022, does that sound correct?

A Yes, I guess so. I don't know I wouldn't be able to tell you. She has been with her for a while now.

Q Do you know when your daughter first expressed to Melissa Marino that she regretted the top surgery?

A No.

Q If I told you, your daughter testified that she did not feel like she regretted the top surgery to about three years after the fact, do you have any reason to disagree with that?

A Well, I know it was with Melissa, so clearly years have passed, but like I said she and I were maybe butting heads about something, like, did you go for your permit, did you sign up you got to follow through. She is, like, I had a really rough day.

I am, like, every day is a rough day, what what what. You know so I just I don't know when initially. I feel, like, they had been discussing it for some time. Whether it was a month or two weeks, or three months, I don't know. I just know when she told me what happened, you know, why she was having a particularly bad day, you know, I kind of, like, dropped what we were

disagreeing about and I hugged her and I and and, you know, we, we again, like, she is hard. Like to, she is not giving, like, lots of details, like, I just supported her, in that was she was very upset.

(Marked for identification, Defendant's Exhibit B, Consent Form, dated June 19, 2024.)

BY MS. KATZ:

Q Okay. Mark as Defendant's Exhibit B, consent forms from Northern Westchester Hospital, dated --

A I'm listening I'm just going to turn this A/C down.

Q -- dated December 16, 2019?

A Okay.

Q Showing you what was marked as Defendant's Exhibit B for identification. The first page is an anesthesiology consent for bilateral breast reduction, procedure on December 16, 2019. Are you able to see this form?

A Mm hmm. I can see it.

Q It is a two-page document anesthesia consent. On page 2 towards the middle/bottom of the page, where its says "signature of patient or

authorized representative" is that your signature?

A It is.

Q Did you read this form, before signing it?

A Yes.

Q Did you understand the risks of anesthesia at the time you signed it?

A Yes. Some degree, yes, yes.

Q Did you understand that general anesthesia carries a risk of death?

MS. LONDON: If you know, Claire.

A I am sure that I overlooked I looked it over. I think I have been under anesthesia. I take medication like I don't think we focus on every negative thing that can happen or no one would ever have surgery for anything. I am aware that there are risks. By and large vast majority of the time, the worst case scenario does not happen, so you know.

BY MS. KATZ:

Q Right. I am not arguing. I just want to know are you aware that general anesthesia, one of the risks of general anesthesia --

A Yes.

Q Okay. Page 3 of Defendant's Exhibit B

is a consent to operation invasive diagnostic procedures for bilateral breast reduction top surgery removing all breast tissue. On the second page, where it says patient, agent, relative, guardian, is that your signature?

A Yes.

Q Did you read this form before signing it?

A I did.

Q You also spoke to Dr. Chin about the risks, benefits, and alternatives of this procedure?

A I don't feel that we had a discussion. It is -- it is in here, you know. And I signed it.

Q When you say you don't feel like you had a discussion?

A He and I did not have a discussion. I mean, that is no slight to him. It is on me. I signed this.

Q Prior to your daughter undergoing the surgery, did you do any research about the potential for trans kids, to de transition?

A No.

Q You were aware that there is statistics however small from Dr. Einhorn, that there is a

percentage of kids that do de transition, correct?

MS. LONDON: Objection. Rephrase the question. She only said Dr. Einhorn told her that 94 percent of trans kids don't have regrets. She never said anything about Dr. Einhorn discussing de transitioning.

BY MS. KATZ:

Q Rephrase it. You are aware that there is a certain percentage of kids that regret having top surgery?

A I am now. I was not then. I could have said what about that six percent, you know, I didn't.

Q Would it be fair, based on the fact that he said -- withdrawn. You are aware by the fact that he said 90 something percent of kids don't regret it, there is a -- percent that do regret it?

A He said people. It wasn't just kids. I didn't focus on that six percent, again, because my daughter was already talking about killing herself, and it is what it is, it is what it is. I didn't even know de transitioning. I mean I was always sometimes who supported, like, LBGTQ+ but I

truly in hindsight I didn't really know what it meant until it affected me absolutely personally. I really didn't know what beyond gay and lesbian, but, like, just, like, I'm all for people being loved and accepted for who they are. Until it affected me personally, I really didn't fully understand it. Until de transitioning, fully effected me I really hadn't heard of it and certainly didn't understand it, so, you know.

Q Was there a period of time from after Dr. Chandler's revision surgery up until you became aware that your daughter regretted the surgery that she was been happy living life without breasts?

A I don't think it was living with or without breasts. That wasn't how it was framed, but I remember saying, you know, if it was three months or five months, like, I thought, like, this you emotional lability. This eating all these eating things.

I thought all this stuff was going to dissipate. And I said this to my daughter that is who I live with. And I am still seeing these symptoms of mental health problems and unhappiness, you know, so I wouldn't saying that she was ever happy. And she still isn't to this day. How much

of that is from doing a surgery, that, you know.

Q I guess I'm not asking if she was happy overall, but was there a period of time that she was happy with her decision to have the surgery?

A I wouldn't say she was saying I am unhappy with this decision. I don't think it was a day-to-day thing that we discussed.

Q Okay. Has your daughter had any new diagnoses since she decided to de transition?

A I don't believe so.

Q So, it's still basically all the same sort of problems that she battled with her whole life?

A Not her whole life.

Q For the past ten years?

A Yes.

Q Does she have friends now?

A No.

Q Does she have any social life?

A No.

Q Does she text with anyone?

A Not really, no.

Q She has appeared in two -- withdrawn. Has she appeared in any short films?

A She's, you know, she has done she has

done some short films, you know, for colleges, she has done auditions, she doesn't have lasting, she doesn't have friends.

Q Has she ever had any friends?

A When she had, like, successful like school experiences that were completely disrupted by a custody thing I don't feel needed to happen and certainly didn't need to drag out three years, so when she was moved back and forth from her father to here, moved from school to school, no, she didn't forge, like, lasting friendships.

Early on, she had the friends that she had at that initial school, like, Crossroads and then transitioned into Longview, she had friends, but that is a long time ago.

Q Not since she was in elementary school?

A Basically. Pretty much.

Q Is she able to take care of herself?

A Yes.

Q Able to make decisions for her on a day-to-day basis, like what to eat? What to wear?

A She still has eating issues. I mean, I work a full-time job, more than 40 hours a week. But when I am around, I am going to have this for breakfast, what do you think if I have this for

lunch. Don't think it's too much if I have this for dinner. There is still I am glad she is not anorexic and, like, starving. There is still she is on the spectrum, but she showers and she can make a doctors appointment on her own. She couldn't do she is very shy and introverted. I think beyond what is maybe a normal age.

But she definitely been able to, you know, she gets, you know, auditions and callbacks and occasionally she will have some even if it's nonpaying work, she had has some paying, she has a camp counselor gig for a few weeks last summer. But she was let go of two jobs and I don't think she knows why. I certainly can't know why.

Q Okay, I am going to hand this over to my co-defendant, but thank you. I may have some follow-up questions. Almost done if not completely done.

EXAMINATION BY

MR. BUGLIOSI:

Q My name is John Bugliosi. I represent Dr. Chin and CareMount Medical, I have a few questions for you. Almost all of them are going to be follow up, so some of them may not make sense to you. So just please let me know and I will

rephrase the question for you. Where is Bambini currently? Where are they located?

A Poughkeepsie, New York.

Q Is that where they were throughout your child's treatment there?

A Bambini, yes. In Poughkeepsie, yes.

Q It's still called Bambini?

A Bambini Pediatrics. Riverside is like, I don't know if it's Columbia Pres -- it is one of the bigger.

Q That is what I am trying to get at. All of them seem to be getting into bigger and bigger groups?

A Yes.

Q How would you compare your daughter's emotional problems today, 2024 to how they were when she was age 16 but before Dr. Chin's surgery; is it worst, same, better, something else?

A I feel like some things are better. Some things are the same. And given the fact that she is 21, I would categorize having a meltdown at 21 being worse just because, like, you know, there isn't maturity with age. You know what I mean.

Q What about anxiety?

A Anxiety. She still has anxiety.

Q Is it the same, worse, better, since 2016, in her age 16?

A I feel like in certain ways it might be worse. I don't know if, like, the pandemic, like, played a part in that. And other things. I just it's hard to say. Certain things are worse.

Q Is she able to drive?

A No, she doesn't drive.

Q How does she get to doctors appointments?

A I drive her or her step father drives her or occasionally if both cannot get out of work, have a family friend, you know, help out and give her.

Q How does she spend her day, typical day, briefly, what does she do?

A She has a lot of time on her hands at home. She tries to meditate and she does other things to mitigate anxiety, like, like, visually, visualization, like, exercises, breathing to mitigate anxiety, mitigate depression, like meditating. A lot of things geared towards trying to maintain, like, some mental health. She looks for jobs, you know.

Q Does she exercise at all?

A Yes.

Q What does she do?

A Well, we have two dogs that she, you know, sometimes weather dependent often will get walked for an hour. She does yoga here at home, you know. That is pretty much it. We have little small weights. She will incorporate that into her, like, yoga and stretching.

Q You said, you and your husband were both independent contractors? Did I hear that correctly?

A Right.

Q Does he have any medical training?

A None.

Q What does he do for a living?

A He is like you know right now he's doing handyman. He's just been in construction and commercial fence building. You know now kind of, like, a jack of you all trade handyman kind of thing he is doing.

Q Did your daughter before she had the surgery, the top surgery with Dr. Chin did she anyone who had top surgery personally?

A I do not think so. I don't believe anyone although there were other trans kids at

Oasis, I don't -- although I don't recollect if TransParentcy was before or after she had surgery. I think it was both. I think we started going maybe, shortly before. So the young man that ran the children, the young adults, 18, ran that group. He had transitioned from, you know, female to male and had had surgery at that point in his life, but he was, like, 25 or 26 at that point.

Q Melissa Marino; is she a social worker? Do you know what her education, her title?

A I think she is a psychologist. I think. I don't think she is, like, a licensed mental health professional or whatever. I think she is a psychologist.

Q How often does your daughter see her currently; is it over the phone or Internet or something else?

A Yes yes it is, like, a Zoom thing.

Q How often, just roughly?

A Sometime it is weekly and sometimes it is every other week. Depends on Melissa's schedule, I think Fox has plenty of times on her hands.

Q Does she see anyone else for mental healthcare, currently?

A No.

Q Is Melissa Marino part of a larger group?

A I don't know. I don't think so.

Q What is her address? Do you know? Where she is located or office?

A No, I don't. Like I said, they pretty much do the Zoom thing. I think it was after COVID it is just, like, virtual thing.

Q When she treated with Kevin O' Donahue was that also over the Internet, Zoom?

A We went down a couple of times, couple a few times. And she had a very strong dislike of him.

Q Where is his office?

A He was in Manhattan.

Q Do you know the address?

A No, I have been there. I don't recollect.

Q Was he a solo practitioner or is he part of a larger group if you know?

A I think it is called the Positive Mind Center.

Q I have heard of that in this case, thank you.

A Yes.

Q How about 400 Stony Brook Court, No. 1 does that sound like a possibility for Melissa?

A Yes, you know what, no.

Q I don't know what town. I can't help you much more than that.

A I can't help you at all because I don't even know much, yes, I don't know. I don't think I have ever met her. I have spoken to her on the phone. I spoke to her recently on the phone.

Q Is -- did you say, Katy and Christy did I hear those right, as also prior?

A Kate.

Q Kate. And what is the last name?

A I believe it was pronounced Roell, but it was R-O-E-L-L. I believe. Happened seven years old.

Q Christy? Last name?

A Gotto, G-O-T-T-O. Gotto.

Q Is Kate or Christy part of a larger group?

A No. They were both, I think, on their own, like, Kate closed. She framed it as, like, a, a personal emergency, and, like, closed her, like, her own practice. Just her. Probably would have

seen someone else in her group, but.

Q And the psychiatrist or psychologist, Darcy Leon, from October of 2021, does that ring a bell?

A Was that something at the Positive Mind Center.

Q That I don't remember. I just have a note and I was going to ask you if you recognize that name?

A I think it she might have been affiliated and then we ended up with Kevin.

Q Okay, all right. Do you know if she had any boyfriends, or girlfriends, since the top surgery?

A No.

Q Does she identify as gay, straight, or something else, currently?

A I think she -- we don't she is very unusual, in that, like, I don't know if she has any, like, feelings. I mean, she identifies as gay, but she is not, like, you know, like, oh, my gosh she is totally my type, she is cute, you know, it almost, like, asexual.

Q Okay. Where was the revision performed? What was the name of the facility?

A That was at St. Vincent's in Bridgeport because the other facility that Dr. Chandler, used I don't recollect if it was, like, Wilton, but she just basically said, like, it is thousands of dollars more to go to whatever other hospital, because just the where it was, and I was paying out-of-pocket.

Q That is my next question. Was that six thousand?

A No.

Q What did you pay? How much?

A I think it might have been, like, thirty eight hundred, maybe. And she let me -- after, like, a deposit, a larger, like, a larger deposit then let me go on a payment plan.

Q Did you try to get insurance to cover that or did your daughter?

A I think it was just we knew that it wasn't covered, like, it wasn't, I think maybe Dr. Chandler, I think, maybe was given her insurance information. I think doctors are aware like this isn't covered, like, cosmetic it is considered, like, wholly cosmetic and it won't be covered so that is why I just said, will you work with me, like, I don't have the money to pay it, will you

let me like if whatever I don't remember what she asked for like a down payment, like, five or eight hundred dollars, yes.

Q I think the adolescent medicine doctor is Marcia Nackenson? N-A-C-K-E-N-S-O-N?

A I think I even said like Nackerson at one point. I don't even heard me. Nackenson not Nackerson.

Q N-A-C-K-E-N-S-O-N. I believe, Marcia first name?

A Yes.

Q You also mention an endocrinologist. Was there two separate endocrinologists; one before the top surgery and one after or just one?

A That initial first one, she wouldn't see us. And then I believe it was after the surgery that again trying to, like, figure out why there is, like, as much as she didn't want to get her period, she was maybe identifying as male, you know, there was.

Q Okay. Understand. Go ahead. Continue.

A There were concerns as to why it wasn't happening. And I believe, I forget her name. Again, I can try to chase that down, at that time,

her hormones were, like, in the normal maybe lower, range but were normal. So again, there's really no medical reason why she wouldn't get a period, because she is not a hundred and seven pounds. Any more, like, from anorexia.

Q Her weight normal category currently?

A Yes, it is.

Q There was a note January 17, 2022 and I apologize forgot who this was. But there was a mention of taking hormones, does that ring a bell whether there were any hormones taken in January of 2022?

A Was that 2022?

Q Yes. It may have been note frankly. I am not sure it's documented accurately?

A Yes, I don't was that, was that testosterone hormone?

Q I don't know. It just said hormone so I can't?

A Whenever she saw Nackenson and that was before the surgery so that was in 2022, so I don't know when that was.

Q I don't think it is accurate, frankly. Then a couple of more topics, then I will be done. Other than being on the spectrum, can you provide

any more information about that diagnosis at all?

A About her being autistic?

Q Yes. Has anyone recently diagnosed that?

A Well, I had a conversation with Melissa recently and said, you know, I am concerned it seems, like, this whole, like, germophobe kind of like thing is, like, growing and, you know, she had a meltdown, you know, about, like, a sick cat that I have.

She is afraid that if he is in the house and he is sick, like, we are not getting diseases from the cat, so she still has these ^ -- fear. And I spoke to Melissa and she said that is part of, like, the spectrum, of, like, this, you know, this I don't know rigid thinking and, like, you know, she just kind of said it is part of the autism thing and feeling in control, and.

Q Are you under the impression that Melissa is treating her that condition, partly, or no?

A I don't think that she is treating her because she is on the spectrum. I can't really say, you know, it is she still has, you know, mental health issues, you know, she is still has

depression and has anxiety, and I feel like you know maybe she is going to have a successful working experience.

Maybe some of these things they wouldn't disappear completely, but they would be tamped down because, you know, she has other things to focus on, and other things to occupy her time. And she feels valuable, like, in a work situation, not like she is just, but I don't know, you know, I don't -- I don't know if she is ever going to be capable of holding down, like, a regular job because she is 21. I don't know. I don't know.

Q You mentioned an IEP. When -- what school or schools was it where she at when she had an IEP?

A I believe, when she was at JFK, it was through the court that she was being evaluated. And this -- ^ and just like some of the emotional issues that was it wasn't, like, schizophrenic. But just kind of like this blanket of like anxiety, like, she was, like, in elementary school in a classroom, like, growling at other kids like when the teacher was, like, you are not going to go out to recess if you don't finish and they, like, called and said she needs a mental health, like,

evaluation, like, she is scaring the other children. And she had that evaluation. They said is just, like, atypical behavior, stemming from anxiety like not biting other children. It's just she I don't know. I mean prior to the whole custody thing and her father and I splitting up, she didn't have all these issues, you know, not to say they wouldn't have manifested in some form or fashion, you know, like she was only six and then turned seven so who knows where it would have gone. But she went to school. She had friends at school, little friends. Like not deep relationships. But she had fun at school.

So, you know, no one was calling and saying we are seeing some weird stuff maybe you should get her evaluate. It was a small private school. I don't know. Sorry if I am rambling.

Q When did she last see a psychiatrist?

A Psychiatrist. I feel like, maybe when she was seeing Dr. Einhorn, to be assessed for medication.

Q I saw that report. Anything since then?

A Psychiatrist, no I don't.

Q How do you spell her middle name?

Grayson?

A Yes.

Q How do you spell that?

A G-R-A-Y-S-O-N. Grayson.

Q Thank you very much. I don't have any other questions for you, ma'am. Thank you for your time?

A Thank you.

MS. KATZ: I just have a few follow-up. Not many.

FURTHER EXAMINATION

BY MS. KATZ:

Q Has Melissa Marino recommended medication for anti-anxiety or antidepression?

A I don't believe so. My daughter has given permission for me to speak to her. I mean, she is 21 now. They have their sessions and unless I have concerns, which is I mean I have my concerns but, meaning, you know, she is not, you know, you know, I don't know. She is not having, like, complete breakdown, like, I don't speak to her on any regular basis.

I am at work. Fox has her sessions. She might express to me, like, something they spoke about, but it is not -- it is very very rarely.

Q Have you ever asked Melissa whether or not medication would help?

MS. LONDON: Objection, help with what.

BY MS. KATZ:

Q Help with your daughter's mental wellbeing, emotional wellbeing?

A I just told this gentleman that I spoke to her like last week, with a concern that her germophobia kind of like is she so I speak to her but.

Q I am just asking you if ever asked her about medications, whether that would help?

A Fox is like considered an adult now. I know how my daughter stands on medication. I don't routinely go against at this age, if my child was talking about suicide I feel like I would have to put her in like place her I don't feel like I am speaking to Melissa on a regular, on a real regular basis.

It is just heartbreaking that my daughter is home and isn't driving, but this is the fallout of her life. I don't know what, if she was going to be like this regardless of a three year very contentious, like, I don't know. I don't

know. But I no I did not ask Melissa specifically, like, because I know my daughter isn't going to take it, any way.

Q Have you spoken to Melissa about your daughter's desire to get implants or de transition?

A No. I know that they have spoken about it. My daughter told me. My daughter is has her issues but she is certainly able to convey when I say I said I had a disagreement with her. She said I had a really rough day et cetera so personally had to talk to Melissa, but I know that is a big topic of what they talked about at some point.

Q Do you have any concerns that her decision to want implants or de transition might also be, like, not necessarily a permanent decision?

MS. LONDON: Objection, you can answer if you understand the question.

A I don't -- yeah no I don't understand, really.

BY MS. KATZ:

Q Do you have any concerns about your daughter's decisionmaking ability to get implant surgery?

MS. LONDON: Objection. Again,

you can answer if you understand the question.

A My daughter is de transitioning. I mean, do I think in a year. It is a thing to de transition. And then go oh, I was wrong about that, I don't think anyone can answer that. She is upset that she is facing another surgery. It is very scary.

It is a big decision. She is frightened but yet, you know, here we are, like, again, she is de transitioning, that is all I can tell you with accuracy.

Q Right. Do you have any plans to speak to Melissa in more detail about potential concerns, before your daughter goes through with an implant surgery?

A I really haven't gotten that far into the process of even thinking about it, like, we are getting the referral next week, so.

Q By the way, does your daughter have any tattoos?

A No.

Q Does she have any earrings?

A No.

Q Has she, other than the top surgery,

has she ever made any other cosmetic changes to her body either permanent or semipermanent like tattoos? Earrings?

A What else can it possibly besides a tattoo or piercing? I'm asking that.

Q I don't know. Something I didn't think of few. Can't think of anything, then nothing?

A Yes no she doesn't have any tattoos. She doesn't even have pierced ears or anything.

Q Has she ever taken antibiotics?

A She has.

Q If I told you that she testified, that it was her understanding that you have the belief that you should not teach your body with foreign substances and that was part of the reason that she didn't want to take hormones, is that accurate?

A I take medication, and I have tattoos, and but anyone who knows me, knows that, like, I am extremely health oriented. I eat extremely clean, and it appears that just by my example, you know, that my daughter has taken it to, like, levels that most people like when you have a headache you take a Motrin, you know, you strain your back, you take, you know, you know, something. A painkiller or something.

She was given antibiotics, after the top surgery to lessen the chance of getting an infection and she did not want to take them, because, like I said, she has this I absolutely feel that way. I feel that everything you have to weigh out risks and benefits and stuff. And I don't just blindly listen to anybody that says oh, take this, take that, take the other. But my daughter just seems like it is a much more extreme level.

Q Did your daughter take the antibiotics, after the surgery?

A She was reluctant to. And then when she spiked a low grade fever, I, you know, I hoy upset, and told her she absolutely had to take it.

Q Is there a reason why your daughter doesn't drive or doesn't have a license?

A I don't know the reason, you know. Her step dad and I have more than encouraged it. I think she is afraid. I think it is the emotional problems that I talked about; not wanting to grow up, not wanting to, you know, she has fears, that, you know, because we have encouraged her.

Q All right. I have no further questions. Thank you.

MR. BUGLIOSI: I would like a copy of the transcript.

(Time noted: 4:33 p.m.)

_____
CLAIRE DEACON

Sworn and subscribed to
before me this_____day
of_____, 2024.

_____
NOTARY PUBLIC

I N D E X

WITNESS	EXAMINATION BY	PAGE
Ms. Deacon	Ms. Katz	5, 216
	Mr. Bugliosi	202

E X H I B I T S

DEFENDANT'S	DESCRIPTION	PAGE
A	Document	133
B	Document	195

R E Q U E S T E D I N F O R M A T I O N

DESCRIPTION	PAGE
Request	13
Request	129
Request	165
Request	172

R U L I N G S

7

22

68

C E R T I F I C A T E

STATE OF NEW YORK)
) ss.:
COUNTY OF KINGS)

I, SHEA SORENSEN, a Notary Public in and for the County of Kings, State of New York, do hereby certify that the foregoing examination of CLAIRE DEACON was taken on the 19th day of June 2024, pursuant to Order and recorded stenographically by me; and that the foregoing examination is a correct and accurate transcript of my stenographic notes.

I further certify that the witness was duly sworn by me, prior to testifying, to tell the truth, the whole truth, and nothing but the truth.

I further certify that I am not an attorney or counsel for any parties or any of the attorneys in this action, and that I am not financially interested in this action.

IN WITNESS WHEREOF, I have hereunto set my hand this 19th day of June 2024.

Shea Sorensen

SHEA SORENSEN

E R R A T A S H E E T

CORRECTION	PAGE	LINE

ATTORNEY'S NOTES

PAGE	LINE	

Exhibits

EX A Claire Deacon 061924
133:8,13
223:12
EX B Claire Deacon 061924
195:7,10,18
196:25
223:13

1

1
208:2
10
27:21 134:18
10-year-old
167:15
10th
132:9 135:21
167:3
11
27:20,21
38:10 42:16
51:17 55:6
146:6 155:25
11:05
41:3
11:13
41:4
11th
167:4
12
37:15 38:10
51:17 52:22
55:6 56:13,
25 57:11,18
72:5 134:21
146:6
12563
5:8
129
223:20
12:31
71:22
13
37:15 57:18
62:6 72:5
98:14 135:4
171:8 223:19
133
223:12
14
40:24 56:25
62:6 72:9
79:15 84:14
85:3 98:15
145:22
148:21
155:8,9
171:8
14-year-old
81:20 82:1,
17 88:9,20,
24
1450
172:23
15
35:3,4 37:12
40:24,25
61:22 63:3,4
84:13,16,21
97:1,9,15
98:16,18
107:1,17
120:9 145:22
147:1,13
148:20
149:18 155:9
159:7 164:22
167:9
15-year-old
77:15
16
23:24 61:22
63:4 97:10,
15 107:17
119:25 120:9
145:22 159:8
160:13
195:15,21
203:17 204:2
16-year-old
121:9 122:1
124:5
165
223:21
17
164:17 212:8
172
223:22
18
127:23
164:17 206:5
19
133:9 195:8
195
223:13
1995
8:8
19th
225:8,22

2

2
133:11,15
195:24
20
79:23 132:24
164:17 167:3
20-page
132:4 133:14
20/20
82:19
2016
204:2
2017
57:1 71:24
72:1,9
79:14,25
80:7,14 85:2
87:6 167:3
2018
13:11 80:9,
14 85:2
87:7,10
92:21 94:12
95:3 104:17
105:9
2019
7:11 11:17
12:6,10
13:11 63:2
104:19 105:9
132:9 135:21
149:18
195:15,21
202
223:7
2021
187:17
188:3,12
209:3
2022
193:25
212:8,12,13,
21
2024
133:9 195:8
203:16
222:11
225:9,22
21
57:11 178:6
180:20
203:21,22
214:12
216:17
216
223:6
22
224:3
25
15:23 206:8
26
180:1 206:8
26th
179:25
27
182:23
2:25
142:18

3

3
196:25
30
15:23 49:12
30-year
135:13
3:21
175:16
3:28
175:17

4

4
35:24
40
49:12 201:23
400
208:2
42
5:7 6:5
45
51:7 55:22
47
161:3
4:33
222:3

5

5
35:24 36:25
223:6
50
49:8,12
500
54:12,15

6

6
35:20 36:15,
25 91:16
133:24
159:23
60
112:12
65-year-old
55:21
68
224:4

7

7
18:1 19:17
35:21,22
36:15 91:16
159:23 224:2

8

8
36:16 42:16,
18 159:23
85
45:3

9

9
159:23
9-year-old
167:15
90
198:17
90s
65:1 110:6
93
110:5
94
65:2 108:7,
10 198:4
94ish
110:4
95
110:5
99
110:7

A

a.m.
41:3,4
A/c
195:14
AA
139:20
abdominal
174:25
abhorrent
91:10
abide
53:16,19
ability
64:20 67:21
68:3 69:16
77:10 218:23
abnormal
171:10
174:18 175:2
abnormality
171:14
abnormally
164:18
abrupt
190:12
absolutely
48:23 61:23
64:18 65:8
67:2 199:2
221:4,15
accepted
81:8 192:12
199:5
access
90:21
accident
17:7
account
122:17 123:9
accuracy
219:12
accurate
42:19 44:5
57:5 59:25
136:13,15
145:21
212:23
220:16
225:11
accurately
70:22 212:15
aches
171:9 173:1
174:24
acquiesce
122:19
acquiesced
111:16
115:22
acted
136:24
acting
50:14 176:9
action
225:19,20
actor
176:8
actual
34:3 98:2
156:22
178:19
ad
168:23
Adam
182:15,17
adamant
24:12
adamantly
23:11
add
26:15,17,20
27:11,14,18
44:17 65:12
69:9 73:19
91:12
added
108:15
132:12,14,
15,17
Adderall
26:24

addition 45:9
address 5:5 6:5 74:18 75:20, 23 82:9 107:3 132:17 207:5,17
addressed 76:4
addresses 76:15
administration 17:2 86:5
admitted 16:18
adolescent 164:19 165:8 166:11 168:14,15, 16,20 172:21 211:4
adult 45:23 165:8 166:11 217:14
adults 45:18 82:4 206:5
advise 125:8
advising 142:9
advocate 47:10,17 91:9,21
advocated 46:3 47:21
advocating 93:3
affected 199:2,6
affiliated 179:10 209:11
afraid 17:14 141:3 142:3 143:11 144:25 213:11 221:20
age 15:2 36:8,15 42:10,16 51:17 52:22 55:6 59:5 62:6 72:9 79:15 84:12 96:25 117:19 147:12 148:16 158:1 202:7 203:17,23 204:2 217:16
agent 197:4
ages 28:23 36:3
agree 24:7 26:7 28:18,19 54:23 67:18 77:13 78:3,4 115:1 123:2 141:2,8 149:19 188:9
agreed 27:4 50:20 51:2 62:2 66:2 67:15 68:13,14,23 74:8 77:22 78:5,18 79:4,7,9
agreeing 90:19 115:1
agreement 55:14 162:20
ahead 166:9 211:21
Albany 127:1,16 130:8 137:23 171:18 173:7,14 174:20 175:6
align 153:12
allay 112:4
alluded 27:6
altering 121:5
alternatives 197:11
ambiguous 86:1
ambulance 17:8 20:20
amount 52:19 80:24
and/or 141:20
androgenous 95:20,23
anesthesia 195:23 196:7,10,13, 22,23
anesthesiology 195:19
anger 52:19
angry 46:15 57:15 92:2
angst 177:11
animal 93:13
animals 36:19 93:4,8
animosity 93:16
anomalies 170:3
anorexia 57:12 58:21, 25 59:8 60:5 212:5
anorexic 202:3
answering 172:9
answers 9:14 55:10 73:1 171:1
anti 29:11
anti-anxiety 25:8 26:5 27:11 74:25 216:14
antianxiety 77:17
antibiotics 220:10 221:1,11
anticipate 5:23
antidepressant 76:15 79:11
antidepression 25:9 26:4 27:10 75:1 77:18 216:14
anxiety 46:19,24,25 65:11 69:8 76:16 91:15 92:1 108:15 203:24,25 204:19,21 214:1,20 215:4
anymore 21:13 137:7 180:21
apologies 19:24 179:1
apologize 100:2 212:9

appeared 200:23,24
appears 220:20
appointment 73:14 151:13 168:8 170:15,18,20 174:1 179:16,24 189:12 190:12 193:8 202:5
appointments 204:10
approval 162:15
approved 64:22
approximate 105:17
approximately 80:14 105:17,19
area 46:12 138:19 180:15
areas 186:20
argue 136:11
arguing 31:13 32:22 93:7,12,17 196:21
arm 112:3 121:8
arms 186:25
arrangement 9:18
arrived 50:18
asexual 209:23
aspects 53:9
assess 161:12
assessed 26:12 27:3, 14 215:20
assessing 34:1
assessment 26:13 27:16, 19,24 82:15 173:11
assignment 153:11
assisting 35:14
assume 178:25
assuming 151:24
attempt 166:21
attempted 78:21 184:17
attend 13:24 14:13 15:2 16:24 53:15
attended 8:2 13:25 15:1 16:23
attending 14:6 46:5
attention 15:24
attest 109:5
attorney 129:24 225:18
ATTORNEY1 182:21
attorneys 54:12 225:19
atypical 215:3
audited 54:13,14
auditions 201:2 202:9
authorized 196:1
autism 44:18 73:17 74:14,22 119:3,4 145:15 146:3,8,10 213:18
autistic 145:15,20 146:7 213:2
autopilot 116:5
avail 190:15
avoid 6:1
aware 19:20 20:1, 25 34:18,25 44:1 58:24 79:1 100:17 118:17 121:9 125:20 162:3 163:2 184:16 186:9 188:18 196:16,22 197:24 198:9,16 199:12 210:21
awful 141:5

B

baby 24:1 177:24 178:4 179:12
back 5:11 11:5,16 12:5,9 13:11 24:20 30:7,9 35:18 43:8 47:7 48:6 50:5 51:15 52:4,8 53:25 54:8,20 55:6 57:2 60:24 67:5,7 76:12 80:10 81:8 84:22 90:19 93:17 101:10 103:6 114:3 123:6 125:9 126:23 128:15 148:10 149:23 151:18 159:16 165:5 168:8 190:14,17 201:9 220:23
background 160:7
bad 92:10 116:1 194:24
ball 58:14
Bambini 60:7,12 62:6,10 63:1,9 64:1 86:14 168:10,11 171:2,7 173:14,19, 20,24 174:1, 14 179:20,22 203:1,6,7,8
Band-aid 165:22 169:22
bankruptcy 7:11,12,15
Barbie's 137:3
barely 143:4

based
28:13 137:25 138:22 180:16 198:15
basic
52:25 116:10 131:22
basically
9:15 26:25 27:6 82:6,15 90:6 91:8 97:24 200:11 201:17 210:4
Basile
9:9 10:13 12:9,22 13:19 63:16 71:5,6 134:14 136:22 161:20 163:12
basis
105:19,22 107:9 138:13 201:21 216:22 217:20
Baskind
61:14,15,16 62:14 171:11
bathing
9:1
bathroom
39:6 57:21 122:20 159:9 165:25
battery
34:2 73:1 74:11
battle
9:21 14:16 35:20
battled
200:12
beach
36:5
bear
153:19,20
beginning
75:19 96:23 101:6
behavior
91:10 215:3
behavioral
45:17
belief
16:13 117:3 220:13
believed
143:8,9 189:22
bell
209:4 212:10
Bella
72:16 85:14 136:22
belong
50:15 93:9
belonged
45:15
benefit
15:19
benefits
126:13 197:11 221:6
big
15:21 36:18 37:16 102:17 139:22 218:11 219:9
bigger
21:13 203:10,12,13
bilateral
195:20 197:2
bind
40:15 102:15
binder
97:4,8,18 98:8,14,19, 22 99:24 181:8,24 183:2,3,5,7, 9,11,13,16, 21,24 184:11
binders
181:16
binding
83:14 84:9, 14 86:23 87:5 97:24 98:3
biological
9:8
bios
125:3
birth
13:18
bit
48:21 52:6 81:16
biting
215:4
blaming
147:2
blank
165:6 172:13,18
blanket
214:20
bled
148:23
blinders
157:17
blindly
221:7
blocking
163:11
blocks
36:14
blood
61:7,11 122:24 165:5 171:5,9 174:24
BOCES
8:2
body
34:19,23 39:17 65:15 78:1,2 83:7, 9 85:5 100:13,18,21 102:2,9,14 109:25 111:5 146:16 147:10 169:25 220:2,14
bolts
150:24
bones
137:5
boots
117:8,21
borderline
44:10
born
13:17 23:17, 20 24:11
bottom
164:12 169:23 170:10,22 171:19
bought
100:4 183:2
box
88:15
boxes
152:8
boy
35:25 37:4, 5,6,10 40:16 96:9 100:23 103:2 111:5 116:13 117:7 124:19 136:25
boy's
86:2
boyfriends
209:13
boys
42:11 45:17 117:23 137:1

148:15,16
BPD
145:19
bra
39:25 40:5, 6,7,11,19,20 97:7 98:13 100:11 102:18
brain
60:2 151:21
bras
39:24 40:4, 10,23 97:12, 17 98:1,3,23 99:1,20,23 100:4,20 102:15 104:12
brave
123:1
break
5:16,17,20 17:20 141:1 192:16 193:12
breakdown
216:21
breakfast
201:25
breaking
167:15
breast
177:17 195:20 197:2,3
breasts
37:8 38:11, 22 40:15 100:22 102:2 103:4,20,23 104:6,13 152:16,20 156:25 185:4 199:13,15
breathing
183:13,24
204:20
Brennan
5:11
Brewster
14:12 33:9
Bridgeport
210:1
briefly
5:11 95:6 102:6 171:22 204:16
bright
44:9
bring
17:2 31:11 47:7,12 48:5 53:24 54:20 75:18 105:23 164:21 179:24
bringing
60:24 93:3 129:7
broached
144:12
broke
138:21
Brook
208:2
brought
20:6 28:11 32:8 37:14 47:16 112:3 137:16 138:3 145:24 146:1 168:4
bruised
184:7,11
buck
85:11
Bugliosi
11:12 70:2 182:14,22 202:20,21 222:1 223:7
build
123:15
building
205:18
built
111:15
bumps
90:18 92:19
burst
46:15
business
33:21
butch
137:19
butt
87:14
butted
56:7,10
butting
81:25 82:10 88:24 93:20 94:7 194:14
buy
104:11 137:3 181:10 183:3,5
buzzed
148:9,12

C

call
20:19 23:1, 22 62:19 73:14 85:19 90:16 151:9 159:24 193:3
callbacks
202:9
called
8:24 14:11 17:1 20:23 21:12 63:13, 15 86:17,20 95:7 101:16 136:21 166:16 168:8 203:7 207:22 214:25
calling
85:22 156:3 215:14
calls
70:17 94:24 155:23
camp
176:6,7,8 202:12
campus
50:22
capable
214:11
capacity
77:20
car
20:20 128:8, 10
card
63:14 86:18
care
7:6,25 8:17, 25 9:1 49:5 151:19 173:23 201:18
Caremount
202:22
Carmel
25:24 27:25 71:25 73:17, 24 146:12
carrier
11:7,14,23
carries
180:15 196:10
case
6:24 7:2,17 9:17 14:9 19:10 23:24 30:14 32:20 44:16 66:20 90:18 147:20 182:7,9,12 191:25 196:18

207:24
cases
9:2
cat
213:9,13
categorize
116:1 203:21
category
79:11 212:6
CE
7:25
cell
11:7,14
cells
171:5,10
center
64:8 121:20
127:1,16,22
130:3,7,16,
17 131:20,23
132:5
133:14,25
137:14,23
138:4,16
139:6,11
173:5 193:10
207:23 209:6
certainty
100:1 106:21
113:17,18
125:23
144:21
certified
93:13
certify
225:7,13,17
cetera
31:21 51:9
218:10
chairs
50:14
challenges
45:17
challenging
104:21
105:14
chance
192:5 221:2
Chandler
187:8,12,14
210:2,20
Chandler's
199:11
change
13:8 60:11
63:17 84:7,8
85:6,15,16
157:4 180:16
changed
47:18 49:12
60:7 83:10,
11 91:13,19
96:15 104:23
105:2 149:3
159:17,18,20
167:7
changing
21:3 63:23
84:8
chart
132:4 133:14
chase
211:25
check
12:21 149:14
189:13
190:14
191:3,6
checked
152:9
checklist
133:16
checkmarks
133:17
chest
104:13,14
122:25
187:21
chested
177:10,11
child
8:24 16:8,9
22:14 23:24
31:11 33:10
36:4 45:6,
21,22,24
50:12 66:18
69:11 107:16
109:19 110:2
111:19 112:6
121:22
123:1,7,15
127:8 136:12
149:21
154:3,9
157:21
159:7,8
161:10
180:14,18,
21,24 181:4
217:16
child's
76:8 134:13
203:5
childhood
21:19 60:21
159:22
children
31:2,10 51:6
104:5 158:20
206:5 215:2,
4
Chimneys
33:13 38:17
42:15 43:6,
10 45:11,16
46:6 47:4
48:12,18,20
49:14 50:5,
11,16 51:1,
24 52:6,8
55:1 101:18
Chin
125:5,20
126:11,20
149:7,18,22
150:6,14
151:4
152:14,21
153:2,10
154:14
155:15
156:13
158:15,25
160:18 185:2
187:13
197:10
202:22
205:22
Chin's
7:2 180:8
203:17
choice
50:1
choosing
31:2
chose
161:25
Christy
25:15,18,23
26:3,7,23
27:9 28:11
33:18,22,24
34:9,12,20
37:13,22,24
41:7 48:24,
25 57:15,16
58:21 71:24
72:6,12
79:20 102:11
119:6 145:18
146:19 154:1
156:6 160:2
208:11,18,20
chronological
188:6
cis
121:14
city
179:9 190:1,
21
Claire
5:1,7 17:19
134:9 172:4
196:11 222:6
225:8
clarification
168:9

class 53:13
classes 56:10
classroom 17:11 20:5, 10 43:18 46:17 49:23 214:22
classrooms 15:21,23
clean 220:19
cleaning 53:7
Clear 6:4
clears 160:20
client 110:10 182:14,18,19
clients 110:14
clitoris 144:2
close 101:14,20 140:8
closed 14:18 33:20 208:23,24
closer 46:14 130:12
clothes 117:12
clothing 95:20,21
co-defendant 202:16
cold 45:25 174:3
college 184:17,18
colleges 201:1
colonoscopy 171:17
Columbia 203:9
comb 135:2,15
combat 117:8,21
combination 60:18 190:25 191:1
comfortable 18:6 35:10 64:10 75:16, 21 83:2,16, 18 100:13,21 101:21 103:8,11 109:17 119:24
commenting 81:6
commercial 205:18
commit 64:21 65:9 68:25 71:2 142:23
committee 94:8
committing 108:17
communicate 13:14 71:13 81:14 90:13, 21 93:15 102:8 113:19
communicated 71:7,16 82:8,21
communicates 190:10
communicating 101:3
communication 9:15 87:19 90:22 106:23 107:8,18 109:6 193:9
communications 107:16 109:10
community 53:7,19 131:5 135:17
compare 203:15
complete 216:21
completed 104:20
completely 5:25 29:24 137:19 177:11 187:3 201:6 202:17 214:5
comprehension 44:24
computer 99:11 158:1
con 136:23
concern 71:2 217:9
concerned 57:16 68:24 71:14 124:12 141:22 213:6
concerns 112:4,5 123:21 138:3 139:2,11,16, 25 140:4,20 141:15 142:22 153:7 156:18 164:7 211:23 216:18 218:13,22 219:14
concrete 170:21
condition 213:20
conference 17:10 20:4
confide 111:15
confided 37:22 111:14 143:5
confident 49:3
conflict 192:11
conforming 35:16 96:13
confusion 83:10
connected 73:14
connection 62:1
cons 24:25 29:18 30:10 32:2 33:1
consent 8:15 11:12 43:21 65:22, 24 66:1,10 150:16 195:7,11,19, 24 197:1
consented 65:16
consenting 116:16
consents 8:7
consequence 53:6
considered 45:3 59:4 92:17 180:21 210:22 217:14
constant 47:18

101:15,19
constantly
21:4 31:12
32:15
construction
205:17
consult
61:19 63:25
149:22
154:18
178:22
consultation
149:6
consultations
127:6
consults
178:12
contact
9:11 10:12
12:15 13:12
81:10,14
89:11,15
132:19
162:21
166:18 190:7
contacted
125:25
contacts
12:18
contention
137:5
contentious
21:2 39:12
125:11
217:25
continue
5:13 104:17
192:7 211:22
continued
52:20 53:21
58:12 65:7
87:14
continuing
80:16
contractors
181:3 205:10
control
54:17 213:18
controlling
94:21
conversation
30:16 32:19
33:2 72:13,
20 75:25
88:1,3 89:3,
6,7,10,17,19
90:6 101:24
104:11
108:20,22
109:15
110:20
111:21,24
112:10 113:5
124:7 140:19
150:3 163:9
170:8 189:17
190:19,20,
22,23 193:6,
19 213:5
conversations
19:16 31:24
32:2,5 34:5,
8 40:2,3
41:13 58:19
59:10 62:13
76:25 83:4
86:4,8,13
100:17 101:4
103:6 106:7
109:2,7
113:12
114:7,10
120:18,24
121:5 122:4,
10 124:11
141:13,19
150:13 156:6
161:1 162:12
177:20
convey
117:11,24
141:19 218:8
conveyed
108:12 112:6
118:1 121:2
conveying
101:12
conviction
108:5
convictions
28:14
convince
49:16 66:7,
22 111:1
112:16
120:11,21
121:6,22
122:7,11,14
124:6 158:24
160:16
convinced
121:25
124:4,5
159:3,5
160:21
convincing
111:18
116:15
159:11
160:22 189:3
copout
153:6
copy
6:23 222:2
cord
9:2
correct
8:3,4 9:9,
10,18,19
10:16 14:6
15:12 16:21,
22 21:7,8
24:6,9,13
37:12 39:3
42:16 44:6
48:7 50:6
52:10 55:15
65:25 66:1,3
71:25 72:2
79:18,19
80:17
113:11,25
114:11 146:4
155:7 157:4
159:4 169:9
179:2 185:4
187:16,18
188:4,7,13,
20 192:20
193:25 198:1
225:11
corrected
154:7
correctly
18:11 205:11
cosmetic
187:21
210:22,23
220:1
could've
87:18
counsel
133:25
225:18
counselor
131:13,14
136:10 139:5
176:7 202:12
counselors
140:12
count
159:19
counting
153:25
County
172:24
225:3,6
couple
36:8 50:19
65:5 75:13
85:9 104:24
110:13
123:10 127:3
139:23
160:10
164:16
177:21
207:12
212:24

coupled
91:22
coursework
8:9
court
6:2 18:2
23:2,22 34:2
53:23,24
54:9,17,20
208:2 214:17
cover
40:15 169:1
210:16
covered
169:18 181:5
210:19,22,23
covers
177:23
COVID
191:12 207:8
Cowan
31:15
crazy
93:19
credentials
111:17
131:16 142:6
CREDO
11:24
cried
122:20,22
161:15
critical
171:15
Crossroads
14:11,13,18,
21 36:10
201:13
Croton-on-hudson
21:14
cry
46:12
crying
39:6,7
57:15,21
70:17
crystal
58:14
culminating
84:12
current
6:5,9 8:20
173:17 174:7
175:8 180:3
cussed
101:7
custodial
9:23
custody
9:16,17,18,
21,22 14:9,
16 19:10
21:2 35:20
39:11 44:16
45:14 91:13
162:20 201:7
215:6
cut
95:8 114:5
148:2,15,16
190:7
cute
42:11
117:10,19
209:22
cutting
190:13
cycle
39:1,2
164:21
165:15

D

dad
49:12 137:7
164:2 221:19
daily
8:25
dangers
78:10
Darcy
209:3
dated
132:8 133:8
195:8,12,15
dates
56:21 57:5
62:24
daughter
6:7 7:7
13:12,17
17:17,18,24
18:14,22
19:21 21:18
22:6,16
23:3,20
24:11 25:8,
16 26:4,16
27:10 28:5,
10,12,23
29:3 30:24
33:5,23
34:11 35:10,
13 37:3,8,
21,22 38:5,
6,21 41:6,
16,24 42:3,
15 43:5
45:18,20
47:14,21
49:4 50:3
51:16 54:18,
21 55:23
56:24 57:7,
21,24 59:11,
15,24 60:4,
11,18 61:20
62:5 65:17
66:2,13
67:10,19
68:17,24
69:17,22
70:6 71:2,8,
25 72:8,22
73:11,17,25
74:22 75:15,
20 76:6
82:3,25 83:6
85:12 87:5,
22 91:14
92:22 93:21
94:10,11
95:4 97:4,25
100:19
102:1,14
103:4,19
104:16
107:25 109:8
110:21 112:1
113:13
114:8,14
115:5 116:25
117:1
118:11,18
120:9,12,15
121:6,7
122:1,7,12,
19 123:19
124:1,8,11
125:21,24
126:9,15,17,
24 128:6,16
131:9 135:21
137:23
139:17
140:4,21,24
141:20
142:5,23
143:1,6,12,
22 144:8,13,
23 145:9,12
146:15,23
149:7 150:7,
20 151:2,4
153:9 154:22
155:16
156:23
157:2,6,9,
11,18 158:18
159:4 161:11
162:5 163:5
165:15
167:25
169:14
183:8,12
184:16
185:2,11
189:25
190:3,24

193:23
194:4,8
197:20
198:22
199:12,21
200:8 205:21
206:15
210:17
216:15
217:15,22
218:2,7
219:3,15,20
220:21
221:9,11,16
daughter's
6:9,24 7:16
12:23 13:7
23:4 34:6,9,
18 58:22
62:15 65:25
86:15 88:6
91:3 127:12
161:23 162:1
164:5 167:13
203:15 217:6
218:5,23
day
45:25 47:5,6
48:5 79:5
108:9 116:6,
7 140:24
156:4 162:1
166:2 177:5
185:17,21
187:6
194:17,18,24
199:25
204:15,16
218:10
225:8,22
day-to-day
200:7 201:21
days
14:4 54:12,
15 78:17
159:16
de
197:22
198:1,6,24
199:7 200:9
218:5,14
219:3,4,11
Deacon
5:1,7,9 6:7
134:9
140:15,20
222:6 223:6
225:8
deal
17:4 144:1
dealing
155:20
174:17
death
196:10
December
63:2 188:3,
12 195:15,20
decide
48:17
169:13,20
decided
24:13,21
47:6 48:6
141:24
144:23 200:9
decision
10:17 16:20
20:22 21:6
23:14 27:5
47:3,22,24
48:11 49:1,
18,20 50:2
55:13,17
60:17 61:20
62:2 66:17
68:17 71:8
77:11,18
109:17
119:15,18,20
120:8 121:6
158:22 159:2
161:14
177:25 178:7
193:1,2
200:4,6
218:14,16
219:9
decisionmaking
77:20 164:1
218:23
decisions
20:16 22:6
23:2 49:24
50:9 158:13
201:20
deemed
50:23
deep
215:12
deeper
61:13
Defendant's
133:8,13,15
195:7,10,18
196:25
223:11
deficiency
171:4
deficits
158:10,11
definitively
85:9 89:21
degree
196:8
democracy
53:8
demographics
133:4
dependent
205:4
Depends
206:21
deposit
210:14,15
deposition
5:23 6:19
30:20 41:3
71:21 142:18
175:16
depression
65:12 69:7
91:15 92:1
108:15
204:21 214:1
depth
150:11
describe
65:21
DESCRIPTION
223:11,18
desire
138:4 152:24
164:5 184:23
218:5
detail
219:14
details
35:17 163:11
195:3
determination
77:20 145:2
developed
38:10 57:12
59:7
developing
38:21
development
119:8
dew
45:25
diagnose
146:15
diagnosed
18:15 73:17
74:22 119:3,
4 145:14
146:3 213:3
diagnoses
18:13 91:12
200:9
diagnosis
213:1
diagnostic
197:1
Dick's
98:12 100:4
die
157:21 170:6

difference
158:23
difficult
56:16 150:25
161:14
difficulties
15:5 26:22
27:17 33:15
76:5 81:13
93:22 107:17
difficulty
183:24
dig
61:13
diminished
189:22
dinner
202:2
diploma
84:3
dire
184:15
Direct
28:15
directed
120:4
directly
22:14 71:7
83:8 92:25
director
55:25 56:8,
10 81:5
87:15 89:25
93:7
disabilities
43:24 45:8,9
88:16 109:20
121:11
disagree
26:8 28:19
194:11
disagreed
55:4 125:10
disagreeing
195:1
disagreement
185:16 218:9
disappear
214:5
disastrous
43:7 45:11
discard
129:25
discernable
58:3
discuss
23:7 32:13
48:22 61:23
71:10 83:16
101:11 120:3
131:2 142:22
143:15
163:22
discussed
48:23 81:1
89:4 101:8,
22 109:3
114:8 120:20
136:25
142:21
143:23
144:11
145:7,9
152:13,14
200:7
discussing
63:8 75:21
94:22 119:24
125:14
130:18 151:2
152:10
194:21 198:6
discussion
24:24 41:21
42:1 48:18
63:11 71:18
81:12 135:8
190:21
197:13,16,17
discussions
38:22 75:8,
11 77:23
78:23 82:24
85:4,6
142:12
diseases
213:13
dislike
207:13
dismissed
7:12 81:24
dismissive
90:25 92:16
disorder
8:25 34:21
57:12 58:16
94:18 145:19
disordered
59:8 60:5
disorders
121:10
disrespectful
101:7
disrupted
201:6
dissatisfacti
on
34:18,22
dissatisfied
35:1
dissipate
189:4 199:21
distraught
45:14
district
33:9 38:15
50:23 51:12,
25 56:19
84:19
division
180:24
Doc
147:5
doctor
21:15 32:1,
14,23,25
60:23 61:24
64:18 73:12,
18 74:21,23
76:12 124:6
125:16
151:18,19,21
158:18
164:20
165:8,9,14
166:11
168:9,16,21
169:7 171:6
172:22
173:8,16
174:20
178:16,19
179:7,13
211:4
doctor's
24:7 179:18
doctorate
122:18
158:19
doctors
29:17 31:16
32:5 58:20
60:20 167:24
170:21
171:22
174:21
177:21
178:10
179:14 202:5
204:9 210:21
document
133:8 135:11
195:23
223:12,13
documentation
136:21
documented
212:15
documents
6:21 59:22
dog
93:4,5,8,12
94:4
dogs
205:3
dollars
210:5 211:3
dolls
36:14,18

Donahue 188:22,24 193:17,20 207:10
Dose 163:20
double 12:21
doubt 8:11 105:12
doubts 158:16,17
drag 201:8
dragged 46:17,25 49:22 54:8, 10,15
drains 122:24,25 156:21
drawn 102:20
drawn-out 47:24
dress 40:16 95:22, 24 118:5
dressed 137:1,20
dresses 96:3
dressing 37:1 95:20 96:9
drive 5:7 6:6 130:11 204:7,8,11 221:17
drives 204:11
driving 178:5 217:22
drop 182:9,12
dropped 20:6 194:25
drove 138:23
drugs 27:7 79:11
Duchenne's 8:23
due 46:25 143:16
duly 5:1 225:14
duty 8:22
dysmorphia 100:18 146:16 147:10
dysphoria 146:16,17
dystrophy 8:23

E

e-mail 81:7,17,24 87:20,24,25 88:18 89:5, 10,19 90:14, 23 109:10, 11,12 132:1, 17
e-mailed 90:16
e-mails 19:16 90:12
ear 31:18
earlier 51:22 73:21
early 57:14 156:3 201:12
earrings 219:23 220:3
ears 220:9
earth 37:19
easier 6:2
easy 103:5
easygoing 91:14
eat 201:21 220:19
eating 34:21 57:12 58:16 59:8 60:5 94:18, 19,20 111:9 121:10 186:13 187:5 199:18,19 201:22
ed 83:24
education 16:13 44:2 123:17 206:10
educational 43:15 47:10, 16 52:15 87:23
educationally 14:2
effect 26:25 47:2
effected 199:8
effects 58:21 78:9 79:2 143:17 144:1,5 145:1
effort 111:18
Einhorn 7:1,7 10:1, 4,9 26:3 28:5 35:7,12 40:13 63:20 64:11,24 66:5,17 69:13,18 72:8,12 73:15 75:2, 25 76:10,23, 25 77:16,24 78:22 79:4, 14,20,23,24 80:8,17 81:2,6,16,23 82:20,24,25 83:5 84:17, 23 85:4 87:18 88:1,6 89:3,17,20 90:1,6,25 92:11,15 93:18 101:2, 22,25 102:5, 12 103:7 105:10,18 106:5,20 107:8,24,25 109:2,8,11 111:21 113:10,13 114:8,10 118:13,23 119:1,14 120:19,21 122:4,6,14 124:1,9 125:5 126:24 127:11 130:3 140:3 141:6, 7,20 143:23 144:9,14 145:5,24 146:13 147:3 151:10 152:1,6 153:8 158:17 159:3 160:9, 19 163:3,21 187:25

188:2,11,14, 25 189:9,19 190:5,20,23, 24 192:1,4, 22 197:25 198:3,6 215:20
Einhorn's 82:15 119:18 125:8 151:8, 16
elementary 14:6 16:24 28:24 33:6 201:16 214:21
embrace 121:21 123:4
emergency 132:18 208:24
Emma 43:2,3 47:21
emotional 17:3 19:20 33:11 39:10 44:3 45:10 46:17,22 47:1 50:13 51:6 52:19 53:21 58:5,8 69:8 70:16 82:1,17 88:11,16 91:12 93:13 101:15 109:19,21 110:2 111:3 122:2 158:10 159:8 187:5 199:18 203:16 214:18 217:7 221:20
emotionally 44:11 95:1 157:18,19 160:13
emotions 123:4
employed 7:21,23 9:6 176:5
employment 8:13
emptied 122:24
encouraged 221:19,23
end 144:2 155:9 188:3 192:23
ended 9:22 26:12 36:21 146:12 168:11 209:11
endo 166:6
endocrinologist 164:5 165:7 166:4,13,22 167:23 168:5,12 170:12,14,24 171:25 172:14 211:12
endocrinologists 211:13
endocrinology 166:10
endoscopy 171:17 173:6
enmeshed 123:3
ensure 153:21
enter 43:17 45:19 46:1
entirety 49:4
entitled 182:8
environment 21:3
episodes 90:11
equipped 17:4
equivalent 182:22
ER 171:8,13 172:23 174:23
ERS 172:25
essay 184:18
essentially 47:23 176:23
established 172:17
estimate 112:9,11
estrogen 164:21,25 165:15 169:7,8,14, 21,25 170:5, 11,22
evaluate 215:16
evaluated 214:17
evaluation 64:23 215:1, 2
evaluations 64:6
event 176:22
eventually 49:19 76:9, 19
evidence 128:24
evolving 47:19 101:3
exact 160:14
examination 5:3 152:16 202:19 216:11 223:5 225:7,11
examining 149:24
Excuse 100:2
exemption 28:25 29:2,5 167:5,6,13, 20
exercise 204:25
exercises 204:20
exhausted 171:16
exhaustion 61:1
Exhibit 133:8,13 195:7,10,18 196:25
exhibiting 33:12 37:4
existed 167:20
expect 156:19
expensive 177:22
experience 35:2 76:17 84:4 87:23 110:13 126:6 142:6 159:13 214:3
experiences 52:15,16 201:6

experiencing
26:21 34:21 46:23 62:19 102:21 104:4
expert
120:14 123:6
experts
45:5 160:1,5
explain
30:18 142:1
explained
20:19 67:14 68:14
explaining
47:14 65:8
explanation
67:17
explored
181:23
exploring
189:13
express
37:1 153:2 161:20 216:24
expressed
66:5 73:5 83:6 101:1 115:6 121:13 137:24 160:14,15 183:15 185:11 188:17,25 189:2,8 194:5
expressing
41:9 83:18 91:22 100:8 114:14,22 120:13 124:2 126:20 139:10 140:4
extinct
121:4
extra
46:20
extrapolating
152:17
extreme
58:9 221:9
extremely
46:16 61:10 91:25 157:25 220:19
eye
88:7
eyes
103:15

F

face
45:18,24 46:13 103:15
facilitate
87:19
facility
8:16 209:25 210:2
facing
219:7
fact
44:7,9,18 119:9 192:21 194:10 198:15,17 203:20
facts
112:5,17
failure
123:17
fair
19:3 54:14 98:25 99:19, 22 113:3 134:24 141:12 198:15
fairly
107:8
faith
111:11
fall
48:13 57:1 79:23 80:11 85:2 87:6 94:14 104:17 105:9
fallout
217:23
false
67:11 68:11, 13
familiar
20:9 29:3
families
31:1,14
family
9:4 54:9,16 140:6 204:13
fashion
215:9
father
9:8 10:11 15:4 39:12 48:25 49:6,7 50:17,25 53:23 54:5 201:10 204:11 215:6
father's
137:5 159:15
favors
92:15
fear
213:14
fears
221:22
feasible
56:15
feed
68:8
feeding
9:1 68:9
feel
15:19 16:2,5 26:20 29:3 32:7 34:11 35:9 37:6,7, 11 43:1,2 49:3,25 51:3 57:5 63:20 73:11 74:5, 11 76:3 78:16,18 83:17 85:25 87:8,17 88:21 89:9, 11,14 90:10 93:15 94:16 96:10,23 97:6 100:20, 23,25 102:22 103:8 105:11 107:21 109:4,16,17, 18,25 110:3, 6 112:19 115:3,24 116:11 120:23 121:2 122:16,18 123:16,25 127:19 132:11 144:18 145:5 155:8 156:6, 10 157:13 162:11 169:22 182:9 186:4,7,8 192:23 193:1 194:9,20 197:13,15 201:7 203:19 204:3 214:1 215:19 217:17,18 221:5
feeling
37:4,10 41:16 66:21 81:15 82:13 86:1 88:22 100:9,18 102:6 120:4 136:13,14 154:10,24

155:6,17
156:8 213:18
feelings
83:1 102:1
131:3 141:15
209:20
feels
83:16 110:9
177:9 214:8
felt
27:16 32:14
34:12 35:15,
24 37:15
38:16,23
39:10,13
41:20,24
50:2 64:18
65:18 69:10
74:14 76:3,
17 77:10,19
87:21 93:9
101:13,21
102:7 107:5
110:24
116:12,20,21
120:13
121:7,21
141:18,21
142:2,5,8
151:7 153:5
156:24
158:11,21
160:11 186:5
190:13
193:11
female
35:2 83:7,9
85:5 135:23
147:9 164:13
170:25
177:14 206:6
feminine
147:6 148:10
fence
205:18
fever
221:14
Fidelis
180:5,9,22,
23
fighting
106:17
figure
211:17
filed
7:11
fill
165:9
filled
28:25 133:21
filling
29:4 131:19
films
200:24 201:1
final
61:4
finally
115:22
financially
225:20
find
33:10 37:17
38:20 51:25
129:23,24
155:22 162:4
finding
73:10 187:1
190:17
findings
74:13
fine
13:1 19:6
37:20 61:11,
24 62:25
75:22 86:22
87:4 99:14,
18 116:17
135:2,14
172:5,6
finish
5:25 28:17
99:21 110:1
152:3 214:24
firm
5:10
firsthand
102:13
191:15
fit
16:3,16
73:12 78:19
88:13 91:24
152:19
five-year-old
77:14
fix
111:11 124:3
187:2
flat
104:13,14
177:11
187:21
floor
159:9 165:25
flu
174:3
fluid
41:8,25
146:19
focus
157:17 158:5
186:23
196:14
198:21 214:7
follow
194:16
202:24
follow-up
165:4 170:21
202:17
216:10
food
94:22
foot
177:13
force
76:9 77:24
99:16
forefront
87:13
foregoing
225:7,10
foreign
220:14
forest
82:5
forge
201:11
forget
140:17
211:24
Forgive
98:6 140:17
163:14
forgot
212:9
form
65:24 66:1
74:7 109:9
131:22 132:9
133:17,24
135:12
150:16 167:6
195:7,21
196:3 197:7
215:8
formally
18:16
forms
29:4 85:16
131:19
134:25
138:18
195:11
forward
121:14 170:8
foster
49:5
found
56:19 57:20
171:3 186:7
foundation
123:15
founder
56:9
Fox
6:9,15 10:11

18:6 26:14 29:25 58:15 63:15,16,23 77:4,7 81:8, 21 86:10 89:12,22 91:21 93:3,4 125:14 139:13 155:14 162:24 166:24 167:7 175:19,20 181:9 189:14,20 191:6,8 192:2,6,13 193:13 206:22 216:23 217:14

Fox's 9:8,18 44:1 81:10 90:17, 24 166:14

fragile 50:12

framed 199:15 208:23

frankly 212:14,23

freaking 111:6

free 91:10 182:9

frequently 106:24 107:21

friend 204:13

friends 29:16 36:6, 7,9,22 42:10 84:4 140:6,9 159:15 200:17 201:3,4,12, 14 215:11,12

friendships 201:11

frightened 219:10

frilly 95:22,24 96:7

front 54:8 123:1 148:8,9 177:14

fruitless 88:23

fucking 159:19

full 6:12,14,16 19:10 58:12 80:21 139:23

full-time 9:6 14:3 56:17 201:23

fully 31:6,7,9 32:17 33:8 35:16 77:22 82:14 199:6, 7

fun 215:13

function 55:1

Furman 5:10

fuzzy 56:22

G

G-O-T-T-O 208:19

G-R-A-Y-S-O-N 216:4

Gabe 83:24 85:22

Gabriel 83:11 85:23 95:6 104:24

gain 94:19

Galaxy 12:4,5,17

gap 79:20

gaps 119:7

garbage 53:3

gave 18:14 33:1 108:11 112:20 128:16 138:21 152:15

gay 34:13 37:16, 23 41:20 42:6 127:1 131:1,4 199:3 209:16,21

geared 53:8 204:22

gender 34:6,9,10, 14,19 35:1, 15 37:1 38:2 41:8,21,25 62:15 64:1 70:1 85:5 96:13,21 127:12 133:4 136:23 143:10 146:17,19 153:11

gender-specific 34:24

general 16:4,13 26:13 27:15 56:23 65:11 75:16 89:23 125:7 152:17 173:22 183:11 196:9,22,23

generally 16:12 109:13

gentleman 173:15 217:8

germophobe 213:7

germophobia 217:10

GI 173:15 174:17,20,21 175:5

gig 202:12

girl 37:10,11 39:14 42:13 81:20 82:1, 17 88:9 100:23 102:23 118:3 119:12 137:8 147:5

girl's 86:3

girlfriends 209:13

girls 36:6,7,11 117:19,23 137:2,4,6

girly 137:8

gist 116:10

give 91:9,23 110:7 121:15 128:4 189:11 190:6 192:2

204:13
giving
8:25 66:19
108:6 112:17
136:13 195:3
glad
83:15 202:2
glancing
135:15
glands
60:25 61:2,
10
gloves
147:24
God
155:25
good
52:14,15
72:14,15
73:12 76:17
83:22 92:7,9
97:23 107:6
115:25
125:6,15,16
126:11
Goods
100:4
gosh
147:25
209:22
Gotto
25:15,18,23
26:3,23 27:9
28:11 33:19
41:7 48:24,
25 154:1
208:19
Gotto's
26:7
grace
13:21,22,23
155:25
grade
15:7 167:3,4
221:14
graduated
92:20 159:14
grasping
123:18
grass
45:24
gravitated
96:5
gravitating
36:21
gray
96:2
Grayson
6:15 13:22
216:1,4
great
19:6 125:17
greatly
189:4
Green
33:13 38:16
42:15 43:5,9
45:11,16
46:5 47:4
48:12,17,19
49:14 50:5,
10,15 51:1,
24 52:6,8
55:1 101:18
ground
168:25
group
103:25 104:1
121:19
128:11,14
206:5 207:3,
21 208:21
209:1
groups
203:13
grow
39:15 221:21
growing
145:22 213:8
growling
214:22
grown
120:7
gsorry
133:12
guardian
49:11 91:21
134:2 197:5
guess
27:3 33:14
36:21 44:2
45:1 57:9
83:14 84:7,
9,19 85:22
90:23 97:23
126:25 131:2
132:11
151:23
164:20 167:3
194:1 200:2
guessing
64:9
guidance
114:24
130:22
guided
117:5
guiding
116:20
gut
87:2 121:3
141:9 142:7
guy
93:18 190:1,
11,21 193:9
guy's
81:24 88:8
89:5
guys
151:5 156:17

H

hair
95:9 148:3
haircut
137:20
148:19
haircuts
148:7
hairdresser
148:17
hairdressers
148:9
half
42:21 43:20
51:17 52:9,
22 55:6
56:13,14,25
150:9,10
169:2 170:15
half-ish
42:18
hammer
158:9
hammering
161:6
hand
31:18 202:15
225:22
handicapped
44:10
hands
46:1 146:21
159:19
204:17
206:23
handwriting
132:10,13
133:1,20
handyman
205:17,19
hanging
186:21,25
Hannah
137:6
happen
54:16 77:25
112:7 140:2
196:15,19
201:7
happened
35:4 46:13
57:25 87:10
92:23 107:4
109:5 115:14
128:17

130:13,17
142:15 160:4
176:12
189:25
194:23
208:16
happening
18:24 20:25
21:4 75:18
84:5 85:10
91:11 107:7,
11 110:3
159:25 186:8
211:24
happier
110:16
happiness
65:9
happy
5:15 37:11
60:19 61:5
64:21 79:7
91:14 109:21
111:3 116:11
185:3 186:19
199:13,25
200:2,4
hard
56:17,22
139:22 195:2
204:6
hated
49:14
head
27:1 43:3
98:16
headache
220:22
heads
56:7,11
81:25 82:10
87:14 88:24
93:20 94:7
194:14
healing
186:20
health
18:17 58:20
63:21 64:20
134:7 138:10
141:25
147:22
152:7,17
157:24 160:7
175:10
180:14,18,
21,24 181:2,
4 184:14
199:23
204:23
206:13
213:25
214:25
220:19
healthcare
170:10 175:9
206:25
healthy
97:20
183:11,16
hear
67:4 68:10
205:10
208:12
heard
11:5 22:13
47:15 70:2
91:24 146:20
199:8 207:24
211:7
hearing
9:17 40:14
104:2
heartbreaking
217:21
height
59:5
held
71:18 135:8
helpful
76:5
hereunto
225:21
hesitation
124:12
hey
35:2 93:20
high
83:23 84:2
120:15,16
higher
108:13
highly
8:11
hiking
36:24
hindsight
81:21,22
82:7,18
88:21 142:14
199:1
hired
47:9
history
150:7,11
hmm
61:18 62:9
108:23
134:15
165:16
167:12 175:4
179:2 195:22
hobbies
36:2 177:6
hold
128:24
160:12,19
186:24
holding
214:11
home
7:25 9:3,5
21:3 51:4
52:7 55:5,20
56:13,24
57:8,10,14
69:11 82:22
89:13
140:24,25
141:3 146:21
158:9 161:6
175:25
204:18 205:5
217:22
honest
165:24 182:1
honestly
98:6 99:12
honor
78:1 102:20
honored
46:23 86:11
honoring
82:15
hope
123:14
160:20
hoping
56:19 84:2
hormone
212:17,18
hormones
143:13,16,23
144:9,15,19,
24 145:10,
12,25 164:16
168:21
170:24,25
174:18
212:1,10,11
220:16
horseback
116:19
hospital
17:9,16
20:21 23:10,
16 43:20
173:5 179:11
195:11 210:5
hospitalized
59:16
hospitals
171:23
hour
112:12,14
113:8,9,11
138:22 150:9
205:5

hours
112:2 169:2 182:4,15,19, 21,23 201:23
house
213:12
hoy
221:14
hugged
195:1
hundred
41:1 42:19 48:16 49:6,7 78:3 109:13 113:17,18 121:3 125:23 137:19 144:21 155:12 210:13 211:3 212:4
hung
121:23
husband
6:6 103:11 140:8,14 161:16 163:24 181:2 205:9

I

idea
28:11 106:6 108:2 115:15,21 116:17,18, 22,23,24 117:2 118:12 119:13 128:19 146:18
ideation
121:10
identification
133:7,13 195:6,18
identifies
209:20
identify
64:2,20 65:2 209:16
identifying
147:8 188:15 211:19
identity
133:4
IEP
46:19,21 214:13,15
iffy
56:22
ill
150:24
illegal
54:11
immature
157:25
immediately
28:4 47:17 50:8
imminent
140:1
immune
171:3
implant
218:23 219:15
implants
158:5 177:17 178:1 218:5, 14
important
31:20 65:18 142:10
impression
44:12 213:19
impressionable
178:8
improve
189:4
improvement
190:4
incident
17:14 19:17, 25 55:24 87:12
incidents
89:24
including
91:20
incorporate
205:7
indefinitely
183:17
independent
205:10
indirectly
94:6
infection
31:18 221:3
inform
161:24
information
22:15 33:1 44:19 66:6 69:12 90:17 91:23 93:10 102:3 121:12,16 127:9 131:22 150:11 210:21 213:1
informed
8:7,15 10:10
informing
162:10 163:17
inhibitors
44:2
initial
80:4 149:6, 17,22 150:14 152:14 154:18 179:18 193:18,20 201:13 211:15
initially
44:16 66:8 75:14,15 77:5 97:7 181:9 194:20
initiated
164:14
injured
17:13 184:10
injuries
9:2
inpatient
59:16,23
input
106:18 161:25
inquired
32:24
instance
47:12
insurance
63:14 64:3, 14,22 86:18 177:23 180:3,7 181:2,6 190:9 193:4 210:16,20
insurances
180:13
intake
73:6 131:17, 22 132:23 135:12 137:11 138:18 168:7
intellectual
44:3
intellectually
44:6,11,13
intense
66:19
interested
225:20

Internet
145:23
206:16
207:11
intervened
87:23
intervention
192:5
interviewed
130:23
interviewing
20:13
introverted
202:6
invasive
197:1
inventory
88:8
involved
8:14 35:6
44:16 53:9,
23 156:7
188:23
involvement
9:25
iphone
12:2
IQ
44:9 45:3
irrelevant
29:24
Isabella
13:19,24
16:1,14
23:16
issue
23:23 29:25
30:13 31:1,
17 32:16
60:24 63:21
69:6 70:1
76:16 94:3
116:16 146:1
165:24 166:5
168:4 170:13
189:6
issues
17:3 19:20
20:12,25
21:2 26:21
32:6 33:11
34:14 39:10
43:15 45:10,
14 46:22
47:8,13
52:19 60:6
69:8 73:7
75:18 81:3,
4,10 82:9,
17,21 84:7
85:5 88:6,
12,25 89:14,
23 90:24
91:4 92:25
94:20,23
101:18
104:22
109:19,20,21
111:9 126:7
127:12
147:22
148:23
171:17,20
183:8
186:13,16
187:4,5,6
189:2,5,7,21
201:22
213:25
214:19 215:7
218:8

J

jack
205:19
jacket
93:6
Jacob
92:3
Jacobs
81:4 82:8,
12,14 85:20
88:3,5,18
89:11 90:7,
16 91:3
92:8,25
Jacobs'
94:4
January
5:11 187:17
212:8,11
jargon
104:2
JC
94:8
jeans
117:22 147:7
jeggings
96:6
JFK
14:6 15:10
16:24 19:23,
25 33:6
43:12,13,14
214:16
job
6:2 8:20
72:14,15
125:17
155:24
201:23
214:11
jobs
155:25
176:10 181:2
202:13
204:24
jogged
48:21 126:5
John
9:9,17
10:13,17
12:9 13:6,11
15:13 19:8
49:16,19
54:19 55:4,7
71:1,4,6
161:20
163:12,17,22
202:21
John's
182:18
joint
9:22 49:17,
20 61:1
jointly
51:2
Jordan
5:7 6:5
judge
15:6 16:19
20:15 49:2
54:9,14
judicial
53:9 94:8
Julia
131:25 182:6
July
132:8 135:20
138:1
jumped
43:3 93:5
June
72:9 79:14,
24 80:7,9,14
133:9 180:1
195:8 225:9,
22
Just...other
122:3

K

Kate
17:6,25
18:4,13,21
19:9 20:18
33:18,20,24
34:6 156:5
159:25
208:13,14,
20,23
Katy
208:11
Katz
5:4,9 7:18,
20 11:11,13

12:13 13:3,5 17:23 18:12 21:22,25 22:4,11,25 24:2,5,16,22 25:4,5,11 28:16 29:9, 14,21 30:2, 15 32:11 41:5 59:20 65:23 66:15 67:4,8 68:4, 9,15,21 70:4 71:23 99:6,9 112:21 114:4 129:21 132:3 133:10 142:20 149:16 154:16,21 157:10 165:13 169:12,16,19 172:8 175:18 181:14,22,25 182:6 183:1, 18 184:2 185:9 195:9 196:20 198:8 216:9,12 217:5 218:21 223:6

Kevin
188:22 190:16 192:8 207:10 209:11

keyhole
126:18,22

kicked
51:18 52:21 56:12,25 92:22

kid
37:11 46:23 49:22 88:24 91:14 165:24 170:4

kids
15:22,23 20:10 27:1 33:13 36:23 42:10 50:12, 13 53:8 65:10 84:1 88:11,15 92:5 104:1 127:23 197:22 198:1,4,10, 17,20 205:25 214:22

kill
65:13 70:7, 20 71:15 143:7 157:15 170:4

killed
69:12

killing
120:16 198:22

kind
12:1 20:11 39:12 43:2 58:8 75:17 77:11 82:3, 14 83:19 86:1 88:7,15 90:24 93:9, 18 95:23,24 96:6 104:15 109:20 117:5,13 123:25 128:11 129:7 131:12 138:20 139:20 147:20,23 148:11 162:9 190:6,13 192:11 193:11 194:25 205:18,19 213:7,17 214:20 217:10

kinds
181:15

Kings
225:3,6

knew
22:14 23:12 55:11 100:12 142:5,8 148:14 156:2 157:24,25 158:18 161:12 185:24 186:6 189:25 210:18

knowing
120:10

knowledge
7:4 126:2

Kornfeld
5:10

L

lab
168:17,19

lability
199:18

labs
169:6

lack
166:24 167:25

land
43:19

language
45:1

large
62:21 144:2 196:17

larger
207:2,21 208:20 210:14

lasting
201:2,11

law
5:10 49:11 91:20 167:6

lawsuit
158:4

lawyer
135:14

layer
65:12 108:16

LBGTQ+
198:25

leading
115:18 123:20

lean
8:18

learn
184:10

learned
162:24 163:8

learning
26:21 43:23 45:8 46:21 88:15 109:20 121:11 158:10

leave
53:13,18 75:19 87:11 94:25 143:10 155:24 156:3 165:6 172:13,18

leaving
53:3 55:2 57:13

led
87:11

left
23:9 38:18 50:1 60:21 172:21 186:22

legal
6:12,13,16

135:11
legally
63:17
leggings
96:5
LEGO's
36:14
length
10:8
Leon
209:3
lesbian
131:5 199:3
lessen
221:2
letter
114:21,22
115:10,11,
12,14,16
116:9,12,23
128:15,16,
18,23 152:11
184:21
level
221:10
levels
220:21
license
221:17
licensed
8:11 18:16
134:6 138:9
206:12
lie
110:5,20
121:1,2
life
42:11 70:17
71:11 74:7
79:5 89:12
107:18
110:17
113:21 121:5
123:16
135:13
142:11
158:24
161:23 162:1
199:13
200:13,14,19
206:7 217:23
light
88:15
166:15,19
lightly
161:15
link
189:24
listen
70:5 221:7
listened
91:20
listening
63:20 159:7,
24 172:7
195:13
listens
125:16
literally
50:22 93:7
149:1 155:20
159:17
live
6:6 199:22
lived
186:11,17
189:16
living
175:25
199:13,14
205:15
located
203:2 207:6
Loft
127:2
logistically
193:5
lollipop
126:22
LONDON
7:14 11:8
12:12 13:1
17:19 21:21,
24 22:2,8,20
23:21 24:3,
14 25:2,10
28:15 29:7,
13,19,22
30:5,10,22
32:9,12
59:19 65:20
66:14 67:2,
12,25 68:5,
12,18 99:4
112:20
129:17 132:2
135:7
154:12,19
157:8 168:22
169:10,15,18
172:4,16,20
181:12,20,23
182:3,11,17,
24 183:14,25
185:6 196:11
198:2 217:3
218:17,25
long
16:24 19:1,4
47:23 48:16,
23 55:3
60:20 76:20
88:18 90:23
97:16,25
98:2,23
102:20
111:13,24
113:6 115:21
124:21
138:23 147:6
155:6,17
156:8 201:15
longer
98:5 138:22
148:8,9
185:3
longstanding
106:1
Longview
14:23,24
15:1,3,6,14
16:3,20
19:18,22
36:9,10
38:14 43:10
50:6 51:16
52:2,9,13,21
53:25 54:21,
22 55:6,7,
14,16,24
56:9,12
57:1,2,9
80:10,16
81:5,9,13
84:24 85:17
86:9 87:6,11
88:2 89:23
92:6,20,22
94:12 101:18
136:19
201:14
looked
12:14 51:13
77:4 78:6,7,
24 84:19
119:1,2
125:5,13
152:19
196:12
lose
155:25
loss
57:17
lot
6:2 14:20
15:24 22:15
27:17 36:8,
22 39:10
46:14 47:11
49:12 56:11,
21 61:25
80:5 88:11,
14 89:24
92:5 94:22
102:3 103:6
104:21
107:17
111:17
117:18
125:15 129:8

145:14
146:21
147:22
168:25
204:17,22
lots
84:1 106:15
157:22 195:3
loud
46:18,25
49:24
love
37:20 93:8
loved
9:5 199:5
lovely
172:2
loves
93:4 164:2
loving
61:14
low
164:18
165:23
168:21 169:7
171:5,10
221:14
lower
59:12 110:6
212:1
LPN
7:23 8:3,6,
14,21
lunch
53:4 202:1
lying
167:19

M

made
16:2,15,19
32:20 47:11
49:2 55:13
60:17 66:18
77:18 97:22
108:9 110:23
120:8 121:5
145:2 154:14
177:9 178:7
179:23
185:23
186:3,18
193:11 220:1
maiden
63:17
main
44:2
mainstream
88:14
maintain
204:23
maintained
148:19
majority
196:17
make
6:2 12:20
20:15,16,19,
22 21:5 47:3
49:19,24
50:9 73:14
77:11,20
84:4 93:14,
25 158:13,
21,23 159:1
170:17 172:7
174:25 175:1
193:2 201:20
202:5,24
making
22:5 23:2,14
49:17,25
50:2 168:7
169:25
male
124:19,20
133:5 135:23
137:20
154:24
188:15 206:6
211:19
man
8:23 55:21
120:7 122:1
137:20
161:23
168:4,6
190:4 206:4
Manhattan
193:10
207:16
manifest
52:20
manifested
215:8
March
45:25 193:24
Marcia
211:5,9
Marino
59:22
175:12,14
193:24 194:5
206:9 207:2
216:13
mark
7:18 22:22
68:22 82:12,
14 85:20
88:2 89:11
90:7,16 91:3
92:8,25 94:3
133:12
195:10
marked
46:21 133:7,
12,15 195:6,
17
market
180:17
Martens
147:5
masculine
95:20 117:7,
23 118:2
119:11 137:1
match
65:15
math
51:8 72:4
matter
86:16
mattered
157:13
maturity
119:8 203:23
meaning
91:24 216:19
means
64:4 103:24
meant
42:4 185:24
199:2
measles
22:19
Medicaid
180:4,5,18,
22,25
medical
7:8 22:5
23:2 24:24
29:17 32:5
58:2 63:19
140:11
153:20 164:7
166:15
167:21 170:7
171:20
173:14,23
180:3,12
202:22
205:13 212:3
medically
170:3
medication
9:1 18:22,25
25:9,22
26:16 27:11,
12,15 28:22
73:19,25
74:23,25
75:6 76:10,
14,20 77:1,
17 78:7,22,
24 79:8
196:14
215:21
216:14

217:2,15
220:17
medications
25:16 26:5
28:12 76:1
79:3 119:2
217:13
medicine
164:19 165:8
166:11
168:15,16,21
172:22 211:4
meditate
204:18
meditating
204:22
meet
163:21
meeting
47:12 51:5
53:5,12
93:24 94:9
130:14,17
131:7,8
139:20
146:13
meetings
47:9 53:17
91:3,7
127:22
Melissa
59:22
175:12,14
186:3 193:24
194:5,12
206:9 207:2
208:3 213:5,
14,20 216:13
217:1,19
218:1,4,11
219:14
Melissa's
206:21
meltdown
58:5 106:17
203:21 213:9
meltdowns
95:1 101:15
member
17:12
memory
48:21 126:5
men
47:1 75:16
menses
111:6 164:13
169:24
menstrual
39:2 165:15
menstruation
85:5
mental
18:17 58:20
63:21 64:20
134:6 138:9
141:25
147:22 152:7
157:24 160:6
175:8,10
199:23
204:23
206:13,24
213:25
214:25 217:6
mentally
157:18,19
mention
43:23 211:12
212:10
mentioned
7:10 41:18
48:2 51:22
54:19 55:23
74:21 78:24
98:9 100:3
111:20,23
112:25
152:21
161:19
214:13
mess
70:16
message
163:16
messages
10:23 12:8,
17
met
5:11 156:15
208:9
middle
13:20 28:24
215:25
middle/bottom
195:24
mind
87:13 147:24
153:25 160:5
185:22
193:10
207:22 209:5
minutes
51:7 55:22
101:10 107:1
142:16
mis
96:21
miserable
94:17 124:3
misname
96:21
missing
110:15 112:8
114:6 123:14
161:8 186:15
189:24
mistake
60:3 85:14
108:9 110:23
177:10
185:23
186:3,18
misunderstand
32:21
misunderstand
ing
90:5
mitigate
189:5
204:19,21
Mm
61:18 62:9
108:23
134:15
165:16
167:12 175:4
179:2 195:22
mom
72:14 101:9
114:25
moment
136:14
moments
117:15,17
Monday
176:14
money
47:11 210:25
mono
61:9,12,13
Montana
137:6
Montessori
16:11
month
79:15
107:20,21
115:23
189:14,15
190:14
191:4,7
194:22
monthly
107:19
months
115:18,19,23
123:20
137:16
159:13 167:8
170:15
194:22
199:17
morning
20:22 122:24
morphing
92:2

mortgage
135:13
motivation
60:14
Motrin
220:23
mouth
76:8 103:1
142:1
move
34:16 40:17
66:23,25
89:1 169:3
170:8 172:10
moved
201:9,10
muscular
8:23

N

N-A-C-K-E-N-S-O-N
211:5,9
Nackenson
211:5,7
212:20
Nackerson
211:6,8
nail
136:12
named
43:3
names
63:12,24
64:3 171:21,
22,23
nausea
78:15
nauseam
168:24
navigate
93:25 116:5
necessarily
141:9 176:10
218:15
needed
37:7 39:24
72:23 80:23
100:9 111:19
116:10,21
120:13
121:7,18,22,
25 123:15
153:17
160:12
191:13
192:15 201:7
negative
144:5 196:15
negatives
32:3
nervous
143:11
neuro
8:24
news
119:9 120:6
184:20
night
101:6
nightmare
141:5
nip
93:6
nipped
93:10
nipple
186:21,22
non-responsive
34:17 40:18
67:1 89:2
nonbinary
40:14 96:13
nonissue
31:17 167:17
nonpaying
202:11
normal
37:11 59:3,5
84:3 136:16
164:12,17
170:1,25
202:7 212:1,
2,6
Northern
195:11
Notary
222:13 225:5
note
154:15 209:8
212:8,14
noted
222:3
notes
7:5 225:12
noticed
35:5
number
11:1,2,3,8,
25 81:18,25
87:20 88:8
89:5,18
numerous
28:12 76:24
141:12
nurse
8:11 26:1
28:1 149:25
150:4
nurses
150:2
nursing
9:3
nuts
150:24

O

O'
188:22,23,24
193:17,20
207:10
Oasis
84:16,20
87:9 94:13
95:5,16
96:10,12,19,
25 98:20
104:17
105:8,18
106:4 107:14
167:1,5,10
206:1
oath
136:15
OB/GYN
174:10,15
object
22:20 24:3
29:13 154:12
168:22
objected
32:19 153:19
162:2,4,25
objecting
10:14 23:22
objection
7:14,15
12:12 21:21,
24 22:9
24:14 25:2
29:7,8,19
30:3,20 32:9
59:19 65:20,
21 66:14
67:12,25
68:18 99:4
157:8
169:10,15
181:12,20
183:25
185:6,8
198:2 217:3
218:17,25
obtaining
8:6,14
occasion
70:7
occasionally
31:16 62:21
202:10
204:12
occupy
214:7
occur

17:15 89:19
occurred
86:22 186:20
October
149:13,18
209:3
odds
31:12 32:15
offer
87:17
offhand
165:2
office
126:19
178:15,19,25
179:4,6,18
207:6,15
older
40:12 61:23
62:7,8
Omitted
11:4,6
onboard
49:1,15,21
50:25 66:8,9
114:20,25
121:25
153:22 162:8
one-on-one
102:1 103:20
one-time
28:2
Online
181:11
onus
160:19
open
23:13 31:1
76:8 93:17
opened
14:19
opening
119:23
operation
197:1
opinion
21:1 63:19
64:13 92:12
103:8 118:6
127:13
142:13
144:18
155:10
161:13,24
opinions
63:25 125:8
144:17
opposed
15:18 16:3
38:2 44:3
55:7 60:17
opposition
28:21
opted
26:24
order
152:9 153:12
225:9
ordered
14:8,17 15:6
18:2 97:17
98:7,19
181:8
ordering
34:2 97:4
orientation
38:3
oriented
220:19
out-of-pocket
47:10 210:7
outcome
9:20 116:2
162:13
outdoorsy
36:20
outspoken
76:6
outwardly
147:25
overlooked
196:12
overly
16:8
overprescribed
27:8
overwhelmed
15:21
overwhelming
20:12

P

p.m.
71:22 142:18
175:16,17
222:3
pads
39:23
pages
131:24
132:24
paid
47:10 55:15
92:18
pain
61:1
painful
103:12,13,17
painkiller
220:24
Panas
83:23
pandemic
204:4
paperwork
28:25
parent
91:23 116:4
122:23 134:2
parents
31:6,8,9
32:17 104:1,
4 116:8
127:23
parents'
20:21 43:21
parking
46:14
part
53:6 58:15
71:11 75:17
76:4 79:5
128:9 164:1,
3 204:5
207:2,21
208:20
213:15,17
220:15
part-time
14:4
partake
53:17
partially
28:13
parties
225:18
partly
213:20
pass
91:10,17
152:18
passed
194:13
past
153:5 176:14
200:15
path
82:9
patient
9:23 30:24
121:14
195:25 197:4
patients
121:17
122:12
132:21
pattern
148:22
Patterson
5:8
pause
149:15
192:3,9,21
193:3,4

pay
210:11,25
paying
202:11 210:6
payment
210:15 211:2
pays
190:9
pediatric
173:15
pediatrician
21:10,16
23:4,9,15,19
24:10 31:12
63:21 168:3
173:17
179:17
pediatricians
23:8 60:15
61:21 62:3
Pediatrics
21:11,14
23:12 24:23
25:7,13
30:25 43:22
60:7 86:14
166:16
173:19 203:8
pending
5:19
penis
37:7
people
22:13 23:12
45:5 65:2
75:16 93:9,
11 96:21
108:8,11
131:5 139:23
145:17 160:8
171:7,13
198:20 199:4
220:22
percent
41:1 42:19
48:16 49:6,
7,8,12 65:2
78:3 108:8,
10 109:14
110:7
113:17,18
121:3 125:23
137:20
144:21
155:12
198:4,13,17,
18,21
percentage
65:1 198:1,
10
percentages
108:21
perfect
62:24
performed
126:13
209:25
period
39:22 40:7
50:6 51:5,10
52:7,12 55:5
57:8,22
58:4,6,13,
17,22 59:1,
13 83:1,3
128:20 131:8
154:23
159:10
161:13
166:1,2,3
167:8 185:1
199:10 200:3
211:19 212:3
periods
38:18 57:23,
25
permanent
157:3 158:8
218:15 220:2
permission
216:16
permit
194:15
person
10:19 26:10
36:20 73:23,
24 75:12,13
92:2,3,16
93:12 95:25
107:13,24,25
108:4,6,19,
20,22 109:2,
4,13,16,21
110:10
111:24 113:2
127:14
136:24 142:8
158:15,18,21
159:11
160:6,9,13
173:18
178:25
189:10
person's
42:25
persona
117:11
personal
29:15 93:4
208:24
personality
145:19
personally
19:11 107:24
199:2,6
205:23
218:10
perused
135:1
petition
7:12,16
ph
61:5
pharma
72:19
pharmaceutica
ls
78:4
Phd
120:7 122:1
123:8 161:10
philosophical
167:21
phone
10:18 11:1,
2,3,14 12:1,
16,21 19:15
20:19 75:12
85:19 89:10
90:16 107:9,
12 109:10,15
113:1,10
168:7 178:23
179:1 191:2,
9 206:16
208:10
phones
10:25 12:1
163:18
photographs
6:21 152:20
physical
31:19 65:15
152:15 157:3
physically
49:22 77:24
150:23
152:19
164:12
physicals
62:20
pick
48:5 155:23
picked
46:10 47:4,5
176:17
picture
188:7
piece
74:16 110:15
112:8 123:14
186:15
pierced
220:9
piercing
220:5
pill
76:9

pin
56:22
pink
96:3
place
17:9 74:16 95:2 96:22 107:6 110:18 119:19 131:3 148:18 160:22 190:2 217:18
placement
33:10 38:17, 20 51:4
places
129:14
Plains
127:22
plan
48:5 210:15
plans
219:13
play
29:11 36:11, 13 81:20 137:3,4
played
36:6,10 137:1,2 177:14 204:5
playful
91:14
playground
36:5
pled
191:24
plenty
206:22
plug
99:11
pluses
32:2
point
5:14 9:16 10:18 14:5 19:11 25:6, 7,12,15 26:2 31:13,23 33:17 35:8, 11 38:6 39:13 41:7 52:8 54:16 58:11 61:5, 9,12,14 74:24 76:6, 20 78:4,12 79:9,25 88:17 96:8, 14 97:3 98:13 100:3 103:5 110:18 111:14 114:21 115:9 127:20 129:25 131:10 143:5 147:1,9,12, 23 149:24 150:2 152:9 158:19 159:2 162:22 168:24 170:5 184:17 189:12 191:13 192:14 193:3 206:7,8 211:7 218:12
police
17:8 20:20
polio
22:17
poo
61:3
poo'd
61:3
portion
24:19 30:8 67:6 107:10 114:2
portions
34:16 40:17 66:23,25 89:1
position
30:3
positive
13:10 27:5, 13 43:2 62:17 63:11 87:3,9 96:24 109:14 146:10 150:1 167:4 180:22 193:10 207:22 209:5
positively
95:18
possibility
208:3
possibly
26:1 48:14 62:12 130:10 136:20 152:16 155:8 174:16 187:19 220:4
potential
178:10 197:22 219:14
potentially
23:8 76:1,25 77:16 122:5 143:13 177:16 189:18 192:4
Poughkeepsie
173:19 203:3,6
pounds
212:4
power
81:19 82:10, 16 88:19
powerful
27:7
practical
8:11
practice
28:2 208:25
practitioner
26:1,14 27:16 28:1 207:20
pray
123:14
predominant
73:10
predominantly
36:6 45:16
preference
37:1
preferences
64:2
preferred
86:9
preoperative
156:12
Pres
203:9
preschool
13:24,25 14:2 136:23
prescribe
25:22
prescribed
76:14
present
18:3 19:8 80:3,5 82:19 112:1 154:17 193:16
presenting
133:16
Presently
11:15
preserve
12:23
preserving
113:21
presumes
154:13
pretty
42:14 79:1 105:25 117:20 201:17 205:6

207:7
previous
12:18
previously
125:25
pride
64:7 121:20
127:1,16,21
130:3,7,16,
17 131:20,23
132:5
133:14,25
137:14,23
138:3,15
139:6,11
primary
151:19
principal
20:24 55:24
printed
132:9
prior
6:18 11:23
12:17,22
13:6 14:8
16:7,18
19:19,24
26:2 27:2
28:4,6,7,8
35:19,23
43:9,22
64:14 69:6
70:1 77:3
81:11 89:12
90:22 98:1
99:2,23
126:9 127:6
136:16,18
143:10
155:6,17
156:15
168:13
197:20
208:12 215:5
225:14
private
8:17,22 14:7
15:24 51:10
88:10 167:16
181:3 215:16
privy
81:11 101:23
156:2
probe
99:6
problem
39:11 53:22
149:1 167:11
168:6
problems
14:1 43:16
50:13 53:21
82:1 91:13
110:2 111:4
122:2 157:25
159:8,23
199:23
200:12
203:16
221:21
procedure
150:22
156:24
173:11,13
195:20
197:12
procedures
8:15 104:3
197:2
proceed
110:17
process
5:13 47:24
73:6 85:13
104:3 112:17
114:17 116:8
141:10
146:25
151:15,22,
24,25 152:5
156:22
160:21
219:18
produce
129:18
production
176:15
professional
122:17
206:13
professionals
140:11
170:10
program
56:20 83:22,
24 84:17,18,
20
prohibiting
79:5
project
176:16
promote
165:15
pronoun
86:9,15
105:3 175:23
pronounced
208:15
pronouns
96:15,19
139:21 149:4
175:22
proper
30:19
proposed
63:9
pros
24:25 29:18
30:10 32:2
33:1
provide
129:24
212:25
provided
51:12
provider
175:9
providers
7:8 24:24
58:20 126:25
127:12
167:24 174:8
pry
76:8
psych
17:9,16
43:20 59:23
psychiatric
59:16
psychiatrist
18:19 73:3,
4,16 209:2
215:18,19,24
psychiatrists
175:13
psychoeducati
onal
34:2
psychological
25:25 27:25
45:10 72:19
91:22 146:13
151:16
psychologist
20:13,14
34:1 42:23
64:18 73:3,
5,16 206:11,
14 209:2
psychologists
18:19
psychology
122:18
123:6,7
158:20
161:10
puberty
38:7 39:1,17
public
14:9,17
15:7,18
16:19 19:23
33:15 54:25
88:14 222:13
225:5
pull
47:3 48:17
92:23 131:23
132:1,2

pulling
102:7
purpose
163:15
purposes
64:14
pursuant
225:9
push
102:18
pushed
17:10 19:18, 19 121:14 125:9
pushing
17:13 23:11 24:11 31:19 43:18 66:19 144:22
put
13:1 26:14 49:4 51:23 55:2,5,13,16 78:1,2 92:17 111:11 122:25 142:1 164:20,25 165:14 177:13 217:18
Putnam
83:23 172:23,24 173:5 175:3
putting
53:24 54:21, 22
puzzle
74:16

Q

qualified
158:21
question
5:15,19,20, 24,25 24:17, 18 28:17 30:6,23 32:21,22,23 44:4 64:11, 25 65:4 67:3,4,14, 20,24 68:2, 11,23 69:14, 15,17 70:5 90:4 99:21 152:3 154:13,20 172:8,9 184:3 185:7 198:3 203:1 210:8 218:18 219:2
questioned
64:11,12 65:7
questioning
22:21 24:4 30:12 168:23
questions
5:12 114:6 131:17,25 152:23 158:16 169:4 170:2 182:1, 8,10 202:17, 23 216:6 221:25
quote
97:20 111:10 116:2 164:16

R

R-O-E-L-L
18:10 208:16
racking
60:2
Radkin
61:5,15
rambling
215:17
ramifications
170:7
ran
36:23 206:4, 5
range
170:1 171:1 212:2
rarely
9:14 71:6 216:25
rate
108:12
rating
126:11
ratings
125:6,15
reach
190:15 191:16,19 192:14
reached
88:5
reaching
189:15
reaction
38:25 39:4 58:1,8 78:20 87:2
read
22:15 24:20 30:6,9 44:21 45:7 46:18, 24 49:23 67:7 114:3 125:15 128:23 134:24 184:22 196:3 197:7
reader
185:22
reading
44:23 45:1
real
42:11 217:19
realize
166:11
realized
110:22
realizing
177:9
reason
15:17 20:4 26:21 58:3 61:4 71:10 117:16 144:4 167:14 186:14 194:11 212:3 220:15 221:16,18
reasons
49:14 59:16 114:23 115:2 133:17 183:20 193:4
reassignment
153:12
recall
40:22 62:23, 25 63:8 80:18 85:7 87:4 108:22 109:1 111:21 113:1 114:9 129:11 130:13,16 135:21,24 139:4,7 140:4,12,13 149:10 151:1,3 153:9 160:23,25 171:24 175:6 180:12
recalls
99:7
recap
106:16
receipt
133:25

receive
21:18 115:16
received
7:7 132:5
recently
9:14 118:10
119:11
162:5,24
176:12
208:10
213:3,6
receptive
193:14
recess
41:2 71:20
114:1 142:17
175:15
214:24
recognize
209:8
recollect
8:17 10:2,7
13:9 15:4
16:25 18:23
26:6 27:20
28:3,20
33:8,22
34:10,22
35:11,16
38:4,13 46:9
75:7 84:15
86:10 96:16
99:13,15
108:5 117:17
122:9 129:2
133:21 136:1
137:9,15
144:10
146:22
147:11 153:1
155:11 156:9
180:10,11
184:6,13,15
193:15 206:1
207:19 210:3
recollecting
149:19
recollection
41:9 51:20
57:3 72:10
80:11 113:24
126:2 151:2
155:10 192:6
recollections
156:12
recommend
18:21 23:4
25:7,16 26:4
27:9 72:17
73:24 74:23
75:5 189:10
recommendation
25:19 26:8
119:21
125:20
151:9,16
152:8
recommendations
24:8 118:13,
23
recommended
26:11 33:22
72:12 73:18
74:24 84:18
125:5,13
144:9 169:7
171:18
173:15
174:14
216:13
recommending
10:4,10
78:23
reconstructive
178:20 179:5
record
5:6 11:10
30:16,17
59:22 71:19
135:7,9
188:8
recorded
225:9
records
72:7 79:13
131:24
149:12
153:20
166:15
188:6,10
rectified
47:17
red
117:24
redacted
11:9
reduction
195:20 197:2
refer
25:23 110:13
127:15 130:3
referenced
111:22
references
127:6
referral
151:8,20
178:15
179:13,15,17
219:19
referred
25:21 28:5
59:24 71:25
126:24
127:11
referring
116:23
reflect
72:7 79:13
149:12
188:11
refresh
41:8 51:20
57:2 72:9
80:11
refuse
53:11
refused
28:13 94:9
167:25 169:8
refusing
20:5
regret
55:2 198:10,
18,19
regrets
178:6 188:18
198:5
regretted
185:12
194:5,9
199:12
regular
40:5,6,10,19
107:8 138:12
214:11
216:22
217:19
regularly
106:2 107:13
rehearsals
176:20
reiterate
110:4 159:6
reiterated
113:2
reiterating
94:17
relate
92:25
related
8:12
relationship
58:25 59:12
92:7 106:1,
23 111:13
143:4
relationships
109:23
215:12
relative
197:4
relaxed
186:25

relevance
22:22
Relevancy
30:2
relevant
22:3 30:4, 13,18 156:10
relieved
82:13 85:25 88:22 92:11
religion
29:10
religious
28:13,21 29:2,4,6 167:6,13,14, 22
reluctant
221:13
reluctantly
20:7
remanded
17:15
remember
18:11,13 19:2,3,5,6 25:14 27:1, 21,23 39:21 40:1 41:15 42:6 48:10 50:7 52:16 53:16,22,23 56:2 57:13 60:14 70:23 72:18,20 73:2 74:2 75:3,24 76:22 78:15 79:9 80:25 81:5,15 82:13,24 83:4 85:21, 24 87:8,12 88:22 94:10, 15 95:4 96:18 98:7, 9,12 99:16, 17 102:24,25 106:6,7,10 109:14 114:12 116:9 117:9,14 120:25 122:5 124:18 125:14 126:8 127:18 130:20 131:19 132:22 134:5,6 137:12,13, 17,18,21 138:2,7,8, 14,15 139:3, 9,10,14,19 143:19 144:7,13 145:18 147:17 148:16,17 150:6,10,13 151:6 152:13,23 153:14,23 154:3 155:14,16 156:16,17,20 163:15 164:10,24 165:2,7 168:3 171:11 172:1,3,5,6 173:9,10 183:14 184:5 185:16 189:14 190:2 199:16 209:7 211:1
remembered
135:22
remembering
126:5
reminder
17:20
reminding
182:5
remove
17:1,5 21:6 47:22 48:11 49:16
removed
33:5 48:19
removing
197:3
repeat
161:3
repeatedly
10:10 31:11 66:5 90:1 91:19
repeating
161:9
rephrase
5:16 29:10 154:19 185:6,10 198:2,9 203:1
replied
162:7
report
107:19 151:10,16 152:2 215:22
reported
110:24 111:7
reporter
18:8 24:20 30:9 67:7 114:3
reporter's
6:2
reports
91:22
represent
188:10 202:21
representative
196:1
request
12:20 13:4 106:14 129:20 165:11 172:11 223:19,20, 21,22
requested
24:19 30:8 67:6 114:2
required
64:15,16 152:4
research
29:16 79:3 119:10 124:24 126:12,16,17 181:15 197:21
researched
118:19,21 125:3,21 144:11 145:12,13 146:2 147:10 150:23
researches
145:16
researching
178:9
reservation
153:3
reservations
66:4,21 123:21 124:13 141:23 142:3 161:21
reserved
18:18
resolved
7:13
respect
86:20
respected
142:5
respond
89:4

responded
67:3
responding
89:18
response
88:19 123:24
124:14
147:16
165:19
responsibilities
8:21
responsible
160:20
rest
132:18
restrained
49:22
result
168:19
resume
193:14
resumed
41:4 71:21
142:19
175:17
retrievable
163:19
Rett
8:24
review
7:1,5
reviewed
6:20,23
revised
186:22
revision
126:6 187:9,
15 199:11
209:24
ribs
184:8,11
riddled
91:15 92:1
ridiculous
147:19
riding
116:19
rigid
213:16
ring
209:3 212:10
rip
128:21
risk
108:16
120:15,16
123:12
196:10
risks
126:13
196:6,17,23
197:11 221:6
Riverside
21:11,14
23:12 24:23
25:6,13
30:25 43:22
60:7,12
61:17 62:14
64:1 166:16
203:8
road
90:18 92:13
rock
161:17
Roell
17:6,25
18:4,14,21
19:9 20:18
33:18,20
43:19 159:25
208:15
role
176:11
177:15
roles
176:10
roll
88:7
room
17:10 20:4
37:17 46:18
47:1 119:22
135:25 136:8
139:7,21,23
149:22
150:1,2
154:14
rough
185:17,21
194:17,18
218:10
roughly
206:19
routinely
217:16
Rowan
83:12,24
85:22,23,24
86:11 95:6,7
105:1,2
134:13
136:3,8
Rowan's
132:17
rules
52:18,25
53:17,18,19
ruling
7:18,19
22:23,24
68:20,22
run
36:11

S

Sad
161:25
safe
142:10
sagging
126:7 186:20
sailing
106:25
Samsung
12:4,5,16
sat
19:12 37:14,
16 128:8
138:20,25
156:5,6
scan
151:21
174:25
scared
155:2
scaring
215:1
scary
219:8
scenario
196:18
schedule
206:22
schizophrenic
214:19
school
8:2,5 14:6,
8,9,10,11,
17,18,20,22,
23 15:1,3,7,
18,20,24
16:10,11,16,
19,20,24
19:23 20:6,
13 26:22
28:24 29:1
31:19 33:7,
9,13,16 34:1
38:12,15,19
42:22 43:9
45:16,19
46:1,12,15
48:6,12
49:17 50:11,
14,23 51:1,
12,14,25
52:1 53:1,6,
10,20 54:25
56:9,19,20
57:9 72:24
80:15 81:3
82:22 83:23
84:3,4,19
85:1 88:10
89:13 90:2,

20 91:4 92:6
93:7 104:18
105:6,8
106:3,11,20
107:14
109:23
136:18
146:21
148:25
155:22,23
156:3 159:12
160:4 167:16
201:6,10,13,
16 214:14,21
215:11,13,17
schooled
52:7 55:5
56:13,24
57:8,10
145:25
schooling
38:18 51:13
schools
36:9 50:10,
19 88:14
101:17
166:24
167:11
214:14
scrambling
170:17
screaming
165:25
script
176:21
scroll
12:9
search
129:18,23
searching
177:2
secondhand
102:10
seconds
112:12
secretary
20:23
seek
170:9 190:16
sees
82:2 88:23
174:8
semblance
84:3 123:16
semipermanent
220:2
send
166:15,17,18
sense
202:24
sensitive
45:20,21,23
separate
19:14 27:11
84:10 139:13
211:13
separately
50:17 51:2
139:2
September
149:13
services
134:1
session
18:3 19:12
92:18 101:9
106:10 107:1
112:2,3,16
117:7 119:23
130:24 147:3
sessions
35:7,9,12
57:10 75:14,
17 80:6
82:20 85:3
106:2,4
107:10 145:8
160:23,24
163:25
192:3,21
216:17,23
set
225:21
setting
20:8 26:22
33:16 48:25
50:15
settings
72:25
seven-ish
15:8
seven-year-old
17:13
severe
17:3 43:17
45:17 46:24
60:25 159:23
171:8 174:23
sexual
38:2
sexuality
102:9
sexually
153:12
sexy
117:10,18,19
shape
74:7
shattering
37:19
SHEA
225:5,23
shit
110:1
shoe
177:8
short
85:23 95:9
117:22
148:15
186:11,16
189:16
200:24 201:1
short-lived
15:9,10
shorter
148:3,19
shortly
63:1 206:4
shorts
117:8,22
147:6,7
show
42:12 110:1
131:24 134:5
135:6 152:11
188:6
showers
202:4
showing
132:4 195:17
shows
42:9
shy
202:6
sick
62:21 76:17
141:2 161:18
213:9,12
side
78:9 79:2
143:17
144:1,5
145:1
sign
162:15
194:15
signature
134:1,19,22
135:4 195:25
196:1 197:5
signed
65:24 66:1
150:15 196:7
197:14,19
significant
79:2 80:23
signing
134:25
135:13 196:3
197:7
signs
19:25 92:14
similar
14:19 50:10
51:1 58:1,7

88:15 124:2
simply
139:14
sit
35:9 121:1
155:5
sitting
35:7 55:20
138:18 145:8
situation
46:4 47:19
48:2 214:8
size
156:25
skills
9:3 45:2
skimmed
135:10,18,19
skin
64:10 70:18
110:17 126:7
186:21,25
skirt
96:5
slight
197:18
slit
121:23 141:3
small
14:7 15:20,
23 20:7
167:16
177:10
197:25 205:7
215:16
smart
44:7
smooth
82:8 106:25
smoothly
107:7
sobbed
159:9
sobbing
46:15 165:25
social
19:20 42:23,
24 43:4,15
44:3 47:20
51:5,8 55:21
72:25 200:19
206:9
socially
14:2
solely
55:15
solid
138:22
solo
207:20
son
113:22
114:22
120:15 131:9
SORENSEN
225:5,23
sort
55:23 56:23
58:24 116:5
137:17
180:24
200:12
sound
79:18 187:18
193:25 208:3
sounds
42:18 56:15
79:19
souvenir
128:24
space
31:8
spacing
32:3
speak
17:1 20:23,
24 29:17
54:5 89:16
106:19
107:24
113:14
139:13,15,22
140:7,10
178:17
216:16,21
217:10
219:13
speaking
6:1 9:25
29:16 35:14
77:23 88:2
118:22
140:23
142:13
217:19
special
83:24
specialist
173:12
specific
16:1,14
21:15 36:12
50:21 66:20
87:12 90:3
97:8 113:23
114:9 116:16
121:16 122:9
127:10
139:24
148:18
150:21 151:3
156:8 164:11
173:25
179:22 181:9
specifically
16:15 26:11
31:15 39:21
40:2 90:17
97:22 99:8
100:14,16
104:7 111:25
114:12
120:21
122:13
150:21
152:24
158:20 218:1
specifics
52:17,23
94:15 121:15
spectrum
44:18 73:8,
18 74:14
121:11
146:14 202:4
212:25
213:15,23
speed
26:25
speeding
158:11 159:1
spell
18:8 215:25
216:3
spend
112:15 113:9
204:15
spent
107:1 110:19
111:17 112:2
130:24
spiked
221:14
spinal
9:2
splitting
215:6
spoke
24:11 25:20
26:23 101:25
102:5 107:12
112:25
114:18,19
115:5 137:13
138:16
139:1,4,5,23
140:14
163:12
178:14,18,24
179:1 191:1
197:10
208:10
213:14
216:24 217:8
spoken
81:6 143:12
163:3,4
177:16,18
179:14 208:9
218:4,6

Sporting
100:4
sports
40:11,20,23
97:7,12,17
98:1,3,13,23
99:1,20,23
100:4,11,20
102:15,18
104:11
spotting
58:11
spotty
162:23
spring
48:13,14
71:24 85:2
87:6,10
92:21 94:12
95:3 104:18
105:9
square
190:17
ss
225:2
St
210:1
staff
17:12 131:4
stage
145:6
stages
178:5 179:12
stance
29:11
stand
117:16
stands
217:15
start
17:17,24
84:9 97:11
110:1
started
5:12 14:5
38:21 40:19
60:5 62:5,25
63:4,23
79:22,24
80:8,10
83:14 84:20
94:13 95:15,
19 96:8,18,
25 101:5
104:9,10,16
153:13
193:24 206:3
starting
42:8
starving
202:3
state
5:5 167:7,20
225:2,6
stated
136:15
statement
28:18 67:23
states
167:21
statistic
108:7,12
statistics
66:6,19
110:4,8
111:23 112:5
113:2
120:17,20
122:11
197:24
status
166:14
stayed
92:19 128:10
stays
59:23
steadfast
65:7
steadfastly
66:7
stemmed
21:1
stemming
215:3
stenographic
225:12
stenographica
lly
225:10
step
164:2 179:19
187:1 204:11
221:19
stepped
154:7
stepping
43:8
steps
177:24
sticking
120:7
stipulations
81:8
stomach
171:9,17
173:1 174:23
Stony
208:2
stood
153:18
stop
46:5 58:16
182:10
189:1,9
193:4
stopped
33:5,17
40:9,19 72:5
188:2,11
story
47:6
straight
209:16
strain
220:23
straw
48:3
streaming
176:17
stress
173:2
stretching
205:8
strike
34:16 40:17
66:23,25
89:1
strive
79:6
strong
38:25 39:4
62:1 117:14
207:13
stronger
45:2
struggle
81:19 82:11,
16 88:20
struggled
37:17
struggles
106:15,16
struggling
89:12 90:1
191:24
student
15:25 53:2,
14
students
14:20 132:21
studies
8:12 51:8
55:22
studying
14:1
stuff
40:1 75:20
88:16 111:9
129:8 131:3
145:14,24
170:14
199:20
215:15 221:6
stuffed
36:19
stupid
160:6

style
96:2
subscribed
222:9
subsequent
57:22 114:6
subsequently
118:8,9
subsidized
181:1
substance
75:25 91:7
177:19
substances
220:15
succeeding
72:24
successful
74:7 81:21
82:12 87:22
109:22,23
159:12,14
201:5 214:2
suggested
74:9 77:2,16
78:10 144:21
suggesting
75:3
suicidal
121:10
suicide
64:21 65:10
68:25 69:20
71:2 101:16
108:12,17,21
110:8
123:12,13
142:23
157:22
159:12
217:17
sum
75:24 91:6
177:19
summer
80:15 95:3
176:6 202:12
super
96:6
support
37:19 46:18
47:1 85:12
93:13 103:10
104:5 127:8,
14 128:11,13
133:25
177:12
supported
195:4 198:25
supportive
31:6,7,9
32:17 85:19,
21 119:15
147:18,21
148:1,5
177:25
supposed
91:21 111:10
surgeon
125:7 152:10
153:7
surgeons
118:13,19,
22,24 124:25
125:2,21,25
surgery
8:7 10:15,18
13:7 62:11
63:1,6,9
64:15 65:17,
25 66:3
68:24 69:1,
10 70:8,20
71:3,15 98:2
103:21,24
104:9 108:1
109:3,9
110:15
111:8,22
113:14,15,
19,21 114:9,
15 115:7,10,
17,18,20
116:11,16,25
117:2 118:12
119:14,18
122:8,15
123:20,22
124:13,22
125:6,17
126:7,10,12,
20,24 127:7,
10,24 128:17
130:21
137:14,24
138:5 139:17
140:5,21
141:23,24
142:22,24
143:8 151:3
152:22,25
155:7
156:15,18
157:3 161:20
163:22
164:6,11
168:13
170:23
172:14
178:10,20
179:5 180:8
183:20
184:24
185:2,12
186:11
187:9,15
188:19
189:5,23
193:21
194:6,10
196:16
197:3,21
198:11
199:11,12
200:1,4
203:17
205:22,23
206:2,7
209:14
211:14,17
212:21
218:24
219:7,16,25
221:2,12
surprise
136:5
surreal
93:11
survival
64:19
survive
177:5
suspended
52:3,17,22
87:16 92:22,
24 93:24
94:5,12
susses
123:11
swimming
36:23
swing
19:10
switch
60:15 61:20
62:3,10
switched
33:18 40:10,
23
swollen
60:25 61:2,
10
sworn
5:1 222:9
225:14
sympathy
182:16
symptoms
61:13 79:4
146:7 199:23
syndrome
8:24
system
49:5 171:4

T

T-MOBILE
11:15,16,20
t-shirt
96:2

table
17:10,13
19:19 43:18
53:4
takes
79:21 170:14
taking
76:1,25
78:17 79:5
88:8 143:13,
23 145:10
150:6 212:10
talk
10:17 25:18
30:16 32:24
35:19 39:16
64:4 71:1
90:7 97:4
103:9,25
107:23
114:13
123:19
164:4,9
218:11
talked
34:14 59:11
69:19
103:21,23
111:22
121:16
123:13
124:10
146:18
218:12
221:21
talking
10:14 23:16,
25 29:25
36:15 41:15
42:11,13
77:14,15
83:21 96:3
101:15
103:7,8
104:9 132:16
156:17
159:11 160:3
186:1,2
198:22
217:17
tamped
214:6
tank
117:8,22,23,
24 147:7
177:8
tat
158:14
tattoo
220:5
tattoos
219:21
220:3,8,17
taught
8:6 56:10
teach
51:8 55:21
220:14
teacher
20:10 53:14
56:8 89:24
214:23
teachers
20:8 51:7
85:20 86:5
87:15
tears
177:12
techniques
126:13 151:3
teen
69:8 108:14
teenage
108:14
teenagers
65:11
teens
65:11
teeth
102:7
telling
35:13 49:9,
13 110:21
119:10
132:23
153:10
tells
117:5
ten
42:21 70:24
101:10 107:1
200:15
terms
90:19 144:15
terrible
110:23
test
146:9
tested
171:6
testified
5:2 24:15
28:11 32:13
41:7 51:16
56:24 57:7
120:2,3,6
188:22 194:8
220:12
testifying
225:14
testimony
6:21,24 7:2
70:3
testing
18:19,20
44:8,14,15,
17,25 46:20
58:2 64:5
73:1,7 74:12
79:21 164:14
testosterone
212:17
tests
34:3 74:11
text
10:6,21,23
12:8 13:14
71:13 107:9,
12 109:10
163:13,16
191:10,12
200:21
texted
9:13 10:2
13:7 102:5
107:2 161:20
162:6
texting
13:6 106:13
texts
12:18,22
theater
176:7
theatre
176:15
therapeutic
118:25
therapist
17:6 18:17
33:19,24
34:3 42:23
49:15 72:23
74:4 75:22
81:10,15
90:21 125:11
130:25
131:1,9,11
136:10
148:24,25
175:9 188:21
189:16
191:22,23
192:2
therapist's
90:17
therapists
139:5 140:12
192:10
therapy
163:24
thing
41:19 47:25
48:1 54:2,6
91:13 96:6
97:23 101:19
102:20
110:25
122:22
128:12
141:10

143:10
148:10 149:1
155:21 161:9
168:7 173:2
176:17
196:15 200:7
201:7 205:20
206:18
207:8,9
213:8,18
215:6 219:4

things
19:4 37:14
47:17 48:22
61:23 71:10
73:9 74:18
83:16 92:4
100:24
101:22 103:9
107:6 111:9,
14 112:5
118:7 119:7,
24 124:2,4
126:14
145:20,21
151:25
155:11,12
157:23 158:1
160:20
171:19
199:19
203:19,20
204:5,6,19,
22 214:4,6,7

thinking
27:2 42:13
83:15 85:24
124:19
135:23
191:11
213:16
219:18

thinks
145:16

thirty
210:13

this_____day
222:10

Thomas
6:7

thought
16:21 21:7
37:23 48:22
55:17 64:14,
22 66:12
67:10,18
68:16 74:15
126:4 129:6,
8 186:12
187:13
199:17,20

thousand
210:9

thousands
210:4

threatened
49:5

threatening
53:24 54:20

three-ish
60:10

three-year
39:11

throw
128:22 129:1

throwing
50:14 129:2,
11

thrown
45:18,24

thrust
96:4

tied
46:2

tight
97:7,12,17
98:1,3,23
99:1,20,23
100:20
184:8,12

time
5:16 6:19
7:10 10:3,11
15:18 16:2,9
17:6,21
19:1,4 20:11
21:9 34:17,
25 37:25
38:1,12
39:10,24
40:7,9,18
41:10,17,19,
23 43:7
45:12 46:20
47:19 48:16,
23 49:8
50:6,21
51:5,11
52:7,12
55:5,14,18
56:4,16,23
57:8,20,25
58:7 59:2,9
60:4,6 63:5
64:9 65:18
67:9,18
68:16,23
70:2 71:9,12
72:5 73:21
74:1,20,21,
22 77:12
78:18 79:21
80:24 82:18
83:15 84:5,6
85:23 87:14,
21 89:9
90:9,10,20
92:17 94:11,
13 95:8,19
97:1 102:21
104:12
105:11,13
107:5
111:15,18
112:10,25
113:15
115:17
116:6,7,21
122:15 125:7
128:20 131:8
134:14
136:19
137:11,22
138:4,19,20
139:6 145:7,
22 146:20,21
149:4 153:4
157:2
158:14,25
159:13
164:15,22
170:14,25
176:5 180:8
183:6 185:15
186:4 187:9,
20,24
188:13,14,17
192:11
194:21
196:7,18
199:10 200:3
201:15
204:17
211:25 214:7
216:7 222:3

timeframe
112:18 147:2

timeline
51:21 52:5

times
5:22 18:5
28:12 38:14
49:24 50:1
51:23 52:14
56:18,22
58:10 59:3
61:6 64:8
69:5,21
70:10,11,13,
14,15,21,24
75:5 84:9
88:6 89:16
90:8,13
94:25 104:24
106:8 107:1,
23 113:20,24
114:13,16
115:5 127:4
128:1,3,8
130:6,10
138:13,14,24
139:6,24

150:17
156:15
159:18,19
161:3,16
171:20
174:23
190:17
206:22
207:12,13
tiny
96:1
tip
180:10
tipping
170:5
tired
61:10
tissue
197:3
title
206:10
today
5:13 6:18,20
155:5 203:16
today's
5:22
told
16:3 20:15
28:10 41:6,7
47:6 54:12
64:3,25
69:3,18,22
70:6,10 72:7
77:7 79:13
97:19 100:19
114:21
116:17
118:7,14
119:10
120:19
124:12
125:19,24
126:15,18
127:19 137:7
143:6,15
144:6,13,14
147:13 148:2
149:12,17
162:5,25
163:5 166:4
169:6 177:21
178:3 184:5
190:5
192:13,18,19
193:23
194:8,23
198:4 217:8
218:7 220:12
221:15
tom
37:5 140:18,
20 141:13,
17,21 142:2,
21 143:1
163:22
tongue
180:11
tons
110:12
tooth
135:2,15
top
10:15,18
59:5 62:11
70:8,20
71:3,15 98:2
103:23 109:9
113:14,15
114:9,15
115:10,24
116:24
117:2,8,22,
23,24 118:12
119:14,18
124:22
125:6,17
126:12
127:7,10
128:17
137:14,24
138:4 139:17
140:5,21
142:21 147:7
163:22
164:6,11
177:8 193:20
194:6,9
197:2 198:11
205:22,23
209:13
211:14
219:25 221:2
topic
104:10
181:24
218:12
topics
212:24
tore
93:6
tortured
182:15,19
total
108:5
totally
79:3 81:24
85:18 189:9
209:22
tough
117:11,13,25
toured
50:19
town
208:5
toys
36:12
Tracy
5:9
trade
8:25 205:19
traditional
33:15
train
158:12 159:1
178:6
training
8:5 39:25
40:4,6
205:13
trans
34:15 65:2,
13 84:1
104:1 108:8,
10,11 110:10
121:14,17
127:14,23
131:4 133:5
146:24
147:4,13,19
184:18,24
197:22 198:4
205:25
transcript
165:6
172:13,18
222:2 225:11
transition
12:23 143:14
197:22 198:1
200:9 218:5,
14 219:5
transitioned
14:19 201:14
206:6
transitioning
144:20
198:7,24
199:7 219:3,
11
Transparentcy
103:25
127:19,21
128:2 130:2
139:16 206:2
trauma
110:2 122:2
traumatic
20:14 54:3
116:4,7
122:22
traumatized
45:14
treated
207:10
treating
25:13 33:18
37:22 160:9
188:11,14
193:24
213:20,22

treatment
7:6,17 23:23 29:24 30:13 81:1 82:23 119:1 188:23 203:5
treats
158:20
trees
82:6
tremendous
52:19
trial
54:14
trouble
183:13
true
24:8 67:11, 19,22 68:10, 12 92:13 187:22
trust
111:12,15
trusted
125:8,12
truth
225:15,16
truthfully
130:19
Ts
96:5
turn
160:8 195:13
turned
79:15 115:25 122:21 146:4,9 160:1,2,5 161:11 180:20 187:22 215:10
turning
159:8,23
tutored
51:4
tutoring
51:10
TV
42:12
twisted
121:8
twisting
112:3
two-hour
130:11
two-page
195:23
type
16:11,16 126:20,22 143:4 150:21 209:22
types
9:2 92:5 126:19
typical
53:1 204:15

U

ultimately
65:16 66:10, 11 77:4 125:10 141:23 142:8
unable
45:7
unanswered
170:2
uncomfortable
184:14
unconvinced
122:15
undergo
153:11
undergoing
10:15 109:9 126:10 197:20
underlying
164:7
understand
5:14 16:6 19:4 22:22 31:22 39:9 44:4 62:24 91:11 92:3 102:19 103:16 104:8 119:5 120:17 123:12 157:6 158:6,8 161:4,5 196:6,9 199:7,9 211:21 218:18,19 219:1
understanding
49:10 54:11 93:21 119:21 156:1 167:14 220:13
understood
63:14 157:3,. 9,12 183:10
underwent
63:1 157:2 163:23
unhappiness
186:14 199:23
unhappy
70:17,18 83:6 123:10 186:24 187:4,21 200:6
unilateral
20:16 21:6 50:9
unilaterally
49:2
unit
59:23
unpaid
176:11,18
unquote
97:20 111:10 116:2 164:16
unstable
92:2
untenable
94:1
unusual
209:19
upset
45:4 46:16 53:13 57:14 85:14 96:21 177:7 191:20 195:5 219:7 221:15
utterance
37:9
uttered
37:3

V

vacation
191:13 192:15,16
vaccinate
31:2,4,7,10, 25 32:18,24
vaccinated
22:16,17,18, 19 23:5,8,20 29:1
vaccination
23:25 24:12 29:11,18 166:25 168:1
vaccinations
21:19 22:10 24:25 30:11 32:3,4,14,25
vaccine
166:14
vaccine-injured
22:15
vaccines
23:11 31:8 166:20 167:9

vague 151:2
vaguely 53:15 72:20 74:2 81:15 137:18
validated 81:16 87:21 92:12
Valley 83:23
valuable 214:8
Varian 6:10,15 63:16
vast 196:17
vehicle 50:18,19
verbatim 100:25 124:18 143:20
versus 50:13 84:18
viable 55:20
vibe 117:13
view 31:13
Vincent's 210:1
virtual 207:9
virtually 12:15
visit 28:2 135:20 149:17 150:14,17 152:14 153:10 154:4 156:11 193:20
visitation 9:24 20:12 21:3 91:18
visited 50:10
visits 19:8 80:4 124:9 156:13 193:16
visualization 204:20
visually 204:19
vital 64:19
vividly 117:9
vocal 49:9 102:9
voice 47:14
voiced 153:7
voicing 91:19
vulnerable 121:9

W

wait 5:18,24
waited 128:10 138:25
waiting 33:9 38:19 55:20 138:19
waitlist 126:1
wake 108:9
walked 138:19 205:5
walking 139:8
wanted 15:17 16:10 20:24 23:20 26:14 27:3 31:6 39:14 40:14,16 48:19 54:2,6 63:13,15,17 64:8 72:25 78:1 81:11 89:2 90:17 91:20 92:3 97:21 100:9, 10,12 103:2 114:15 115:6,10 119:4,12 126:21 128:9,17 129:9 133:3 135:16 137:24 148:2,15 150:22 152:22 153:11 164:20,25 165:14,22 166:5 168:9 181:19 183:20 187:9,20 192:6,24 193:2
wanting 37:4,9 102:14,15 136:21,25 221:21,22
warm 48:15
watch 42:8
water 160:12
waver 65:3
ways 101:20 204:3
wayside 157:23
weaned 75:18
wear 40:6 102:14 177:8 183:11,16,21 184:14 201:21
wearing 40:10,19 96:2 97:7, 11,17 98:1, 3,23 99:1,20 117:12 183:9 184:8,11
weather 48:15 205:4
week 14:4 80:1,2, 20,22 161:12 192:7,8 201:23 206:21 217:9 219:19
weekend 176:14,19,22
weekly 34:3 80:17, 24 105:19,22 107:15,19 206:20
weeks 194:22 202:12
weigh 123:13 161:14 221:6
weighing 63:22 120:14
weight 57:17 59:4, 5,12 94:20 212:6

weights
205:7
weird
215:15
wellbeing
217:7
Westchester
195:11
whatsoever
30:12
wheeled
122:19
WHEREOF
225:21
white
127:22
171:5,10
wholly
210:23
willingly
66:8
Wilton
210:3
Winds
17:9
withdrawn
5:18 16:23
17:18 38:5
51:15 74:20
79:23 91:2
105:7 190:19
198:16
200:23
woman
28:3 73:2,11
131:2 132:16
137:19
138:17
139:12 148:8
woman's
137:12 165:3
wondering
94:23
wonky
171:4
word
37:3 134:9
wording
116:15
words
37:18 48:4
102:25 117:6
142:1
160:14,15
work
8:22 47:20
52:1 56:16
57:13 61:7,
11 69:11
70:17 93:14
94:1,23,24,
25 140:25
143:10
155:23 156:3
165:5
168:17,19
171:9 174:24
176:3 177:2,
3 201:23
202:11
204:12
210:24 214:8
216:23
worked
8:16 92:16
worker
42:23,24
43:4 47:20
134:7 138:10
206:9
working
87:17 214:3
works
121:18
world
54:2 145:23
worse
203:22
204:1,4,6
worst
196:18
203:18
worth
21:1 162:2
wrenching
141:9 142:7
wrist
121:23
125:17 141:4
write
45:7 53:2
114:21,22
115:2 116:23
133:5 134:8,
9 152:7
184:17
writing
13:2
written
53:4 93:23
94:7 136:6
151:10
184:23
wrong
18:25 109:25
111:5 164:22
187:3 219:5
wrote
78:18 88:18
115:9,11
134:13 152:1
184:17,22

Y

year
48:13 52:9
56:14 58:1
65:6 80:9,
13,16,22
81:1 82:23
83:5 84:13,
21,23 85:1,
3,7 87:5
96:23 98:4
99:1,10,20,
24,25
104:18,21,23
105:3,6,8,18
106:3,11,20
118:2,10
120:9 126:1
138:1 162:23
167:2 185:13
217:24 219:4
years
8:10 9:15
10:3,12,24
11:21 12:1
14:13,15
15:8 17:16
18:24 23:24
28:6,8 30:25
38:14 42:17,
20 43:21
46:10 49:13
54:10 57:11
60:10 62:18
65:5 85:9
106:22
107:14
111:13
115:24
119:25
123:10
129:5,7
146:11
153:13,24
154:10,15,23
155:25
158:19
159:17
160:10
161:13
162:1,22
164:16
194:10,13
200:15 201:8
208:16
yielded
111:16
yoga
205:5,8
York
5:8 14:12
167:7,20
179:8,9
203:3 225:2,
6

young
8:22 35:24
36:4 92:3
178:7 206:4,
5

Z

Zoom
75:12 206:18
207:8,11